



DEPARTMENT OF
HOUSING



Action Plan

CDBG-MIT

Public Comments

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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 November 23, 2023, and concluded on December 23, 2023.

For the reader's benefit, the comments submitted have been summarized in Spanish and English. In some instances, quoted comments were 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. For additional information, please refer to the text of the submitted comments.

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: <https://recuperacion.pr.gov/contact/> or at <https://recuperacion.pr.gov/en/contact/>
- By mail: Puerto Rico CDBG-MIT Program
P.O. Box 21365
San Juan, PR 00928-1365

II. Public Comments

001	Comment ID:	11/25/23_WP_I_Marta Olivo(1)
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Comment:

Plot of land. I have been trying to apply for years and all the Mayagüez PRDOH director Jose Collazo tells me is pre-application. The [lot] that I was requesting and that they said I would have. They gave it to another family. I feel deceived, abused, and discriminated against. I called San Juan to speak with Ms. Niurka Rivera and they never let me talk. I am an older single mother with a disabled son. I need your help. [REDACTED]

PRDOH Response:

We regret your situation. According to the information provided in your comment, the Puerto Rico Department of Housing (PRDOH) understands that you are referring to the Home Repair, Reconstruction, or Relocation (R3) Program under CDBG-DR funds. Currently, R3 Program has stopped accepting applications. However, in this CDBG-MIT Action Plan, PRDOH established the Single-Family Housing Mitigation Program (SFM). This program provides assistance for the primary residence of low- to moderate-income families located in high-risk areas, as determined by PRDOH. We urge you to contact or visit one of the program's intake centers, located in different parts of Puerto Rico, to verify if your home is situated in one of the areas identified as high risk. This will help determine your eligibility to receive assistance under the SFM Program. To obtain information to contact the SFM Program Centers, visit the PRDOH website available in English and Spanish at <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English) or <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish).

002	Comment ID:	11/27/23_WP_I_Iván Albaladejo Díaz(1)
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Comment:

In the process of finding affordable housing.

PRDOH Response:

Based on the information provided in your comment, we haven't been able to identify the program you are referring to. However, we encourage you to contact the PRDOH team by calling 1-833-234-2324 or TTY 787-522-5950, via email to infoCDBG@vivienda.pr.gov, or by regular mail at the following address: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365 to provide a more detailed description of your situation or request information about the status of your case, if you have any active under a CDBG-DR or CDBG-MIT programs.

003	Comment ID:	11/27/23_WP_I_Daissy santiago(1)
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Comment: *Good morning, I am looking for section 8 assistance for my daughter[,] we are both disabled, we have to move from where we live and I need that assistance but in general moving where I like[,] a peaceful place forgive the demand but if not[,] where it is peaceful or I could go to new you(sic) Orlando since financially I cannot pay rent due mine and my daughter's capacity I hope 🙏 that you understand my need ATT DAISSY SANTIAGO*

PRDOH Response: The Puerto Rico Department of Housing (PRDOH) is committed to implementing strategies for recovery and risk mitigation in order to build a Puerto Rico more resilient against future disasters. As the agency responsible for managing CDBG-DR and CDBG-MIT funds, PRDOH recognizes the need to provide funding for affordable housing projects. As a result, we have allocated part of the funds to entities with the necessary capacity and experience of working with socially vulnerable populations to provide them with a safe home. Likewise, PRDOH will consider the possibility of carrying out additional initiatives for the development of affordable housing under the CDBG-MIT Action Plan. To learn more about the projects and programs available under CDBG-DR and CDBG-MIT funds, visit the PRDOH page at: <https://recuperacion.pr.gov/en/cdbg-mit/> (English) or <https://recuperacion.pr.gov/cdbg-mit/> (Spanish).

004	Comment ID:	11/27/23_WP_I_Luis R. Dalmau Gonzalez(1)
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Comment: *Is this action plan amendable on a regular basis (year to year)?*

PRDOH Response: The CDBG-MIT Action Plan is a document that describes how CDBG-MIT funds are used and how mitigation needs related to housing, planning, and infrastructure in Puerto Rico will be addressed. This document is subject to various amendments during the term of the CDBG-MIT grant to reflect programmatic changes, reallocation of funds, and updates to mitigation needs, as determined by the Puerto Rico Department of Housing (PRDOH). Amendments can be classified as substantial or non-substantial, depending on the nature of the proposed changes. Substantial amendments are significant modifications to the Action Plan, such as the inclusion of an eligible project, changes to program benefits or eligibility criteria, the addition or removal of an activity, as well as the

allocation or reallocation of more than ten percent (10%) of grant funds. On the other hand, non-substantial amendments are any other changes that do not meet the criteria for substantial amendments. If you want to learn more about the CDBG-MIT Action Plan, visit the PRDOH website, available in English and Spanish, at: <https://recuperacion.pr.gov/en/action-plans/action-plan-cdbg-mit/> (English) and <https://recuperacion.pr.gov/planes-de-accion/plan-de-accion-cdbg-mit/> (Spanish).

005	Comment ID:	11/27/23_WP_I_Angel Vega Valentin(1)
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Comment: *I am in the process of receiving assistance from new energy. I am pleased with the process and the excellent work of the case coordinator in the Mayagüez area.*

PRDOH Response: We appreciate your support for the New Energy Program, also known as the Home Energy Resiliency Improvement Subprogram (CEWRI-HERI Subprogram) under the CDBG-MIT Action Plan. The CEWRI-HERI Program is committed to assisting through the financing Photovoltaic Systems (PVS) with Battery Storage Systems (BSS) installations to address the energy needs of low to moderate income households. If you want to check the status of your CEWRI-HERI Program application, visit the following website: <https://nuevaenergia.pr.gov/tu-solicitud.html>. You can also inquire about your case status by email at infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by mail to: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365.

006	Comment ID:	11/27/23_WP_I_Jose Ortega(1)
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Comment: *For this new incentive, I managed to obtain 5 quotes and all of them were 8k to 10k higher than the quotes I had gotten previously. I can say that when all the companies were quoting for this incentive, they inflated their quotes[,] and so the incentive for the citizen was lost. They should allocate the funds to the participants so that this does not happen, otherwise we make the rich into millionaires.*

PRDOH Response: Thank you for your comment. The Solar Incentive Program, also known under the CDBG-MIT Action Plan as the Incentives Subprogram (CEWRI-IP Subprogram) under the Community Energy and Water Resilience Installations – Household (CEWRI-HH) Program is designed to finance Photovoltaic System (PVS) installation with Battery Storage System (BSS) in households where the Area Median Family Income (AMFI) is up to two hundred percent (200%). The CEWRI-IP Program provides a maximum grant of \$15,000 or up to thirty percent (30%) of the home project costs,

whichever is less, to fund the installation of renewable energy systems. Before a round is held, the Puerto Rico Department of Housing (PRDOH) performs an independent cost estimate to verify current market costs of the systems. Based on this information, PRDOH establishes the Reference Costs for each round, which are included in the Round Reference Guide published on the PRDOH website. Note that applicants can select their installer and financing method to ensure they choose the best available offer. To learn more about the CEWRI-IP Program, visit the PRDOH web page, available in English and Spanish, at <https://www.incentivosolar.pr.gov/en/> (English) and <https://www.incentivosolar.pr.gov/> (Spanish).

007	Comment ID:	11/27/23_WP_I_Enrique Aponte(1)
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Comment: *Hello, I was hoping to get in on the first round of the panels system. Since I am elderly at 74 years old and what I receive from SS is \$600.00 and it is not enough for me to live. The government initiative has benefited a small group of people. I hope justice is done. Thank you.*

The Community Energy and Water Resilience Installations – Household Program (CEWRI-HH), funded by CDBG-MIT funds, consists of two subprograms: the Home Energy Resiliency Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), more commonly known as the Solar Incentive Program. The New Energy Program provides funding to Low- and Moderate-Income families with energy needs for the acquisition and installation of renewable solar energy equipment consisting of a Photovoltaic System (PVS) and a Battery Storage System (BSS). This Program provides a maximum grant of \$30,000 for the acquisition and installation of the systems.

PRDOH Response: On January 25, 2024, the New Energy Program sent you an email providing information about the second round of tickets to apply for the Program. Below is the communication:

Thank you for contacting the Department of Housing and for your interest in the New Energy Program.

The next and final round of the New Energy Program will open on January 31, 2024, at 8:00 am with a availability of 6,000 turn tickets.

Starting from that date, tickets can be obtained through one of the following channels:
Online through www.nuevaenergia.pr.gov.
Through our Call Center at 1-833-234-2324 during Monday to Friday from 8:00 am to 5:00 pm.

By visiting one (1) of the ten (10) Registration Centers across the Island during Monday to Friday from 8:00 am to 5:00 pm.

More information about eligibility criteria, income limits, ticket distribution, among others, is available online through www.nuevaenergia.pr.gov.

Thank you again for your interest. We wish you success in obtaining a ticket in the upcoming round.

If you received a ticket, you have until May 31, 2024, to complete your application by submitting the required documentation at the following link: <https://recuperacion.pr.gov/iframes/CEWRI-UI.html>. We urge you to stay tuned to the PRDOH CDBG-DR/MIT website at <https://recuperacion.pr.gov/welcome/en/index.html> (English) and <https://recuperacion.pr.gov/welcome/> (Spanish) for more information on this and other programs. Likewise, the PRDOH team has shared your information to with the CEWRI-HH Program to get a better understanding of your situation and guide you on how to apply for the program. Likewise, the PRDOH team has shared your information to with the CEWRI-HH Program to get a better understanding of your situation and provide information about the program.

008	Comment ID: 11/27/23_WP_I_Miguel A Cartagena(1)
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Comment:

You have been going on about cement houses for a long time. However, when some atmospheric event occurs, many of them have structural damage. For what reason in Puerto Rico are we not starting to build houses with wooden frames and gypsum board interiors? These days they are made fireproof, of different thicknesses, and are easier to work with. Gypsum board is used in the United States and I know it is due to the temperatures. But here in Puerto Rico they can be as resistant with the use of fasteners. We already use the same wood and the only thing that would have to be changed is to use gypsum board. There are still houses like in Naranjito that are made of wood and are 50 years ago. A whole community. Believe me, I have seen the constructions in the United States and in different States and they are incredible. Having prices that here in Puerto Rico do not finance wooden houses. I mean they are worth nothing. Meanwhile in the United States in California a house costs 1 million dollars, a common house that is \$300 thousand in value in another State. You have to analyze it, there are many people without homes and it will take years to build 10 houses[,] for example up to 5 years. It is ridiculous that a residence can cost up to 250 thousand dollars for low-income people. Try it and see how the Germans use women to use putty to make that gypsum like cement. You have to stop the incompetence and the architects get to work charging like millionaires.

PRDOH Response:

We appreciate your participation during the public comment period for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial). As the agency in charge of administering the CDBG-MIT funds, the Puerto Rico Department of Housing (PRDOH) is responsible for implementing

construction methods that emphasize quality and durability. For this reason, in those programs where activities related to the reconstruction or new construction of homes are conducted, the PRDOH team will comply with the established federal and/or local construction requirements and standards. This approach ensures beneficiaries are provided with a safe and resilient home in the event of future disasters, in accordance with industry standards in Puerto Rico. For more information about the CDBG-MIT Programs, visit the PRDOH web page, available in English and Spanish, at <https://recuperacion.pr.gov/en/cdbg-mit/> (English) and <https://recuperacion.pr.gov/cdbg-mit/> (Spanish).

009	Comment ID: 11/27/23_WP_I_Marisol Cintron(1)
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Comment:

R3 Program what I can say that I am a 61-year-old person who has been in the program for about 6 years, I have multiple health conditions, what they want is to destroy the house without even doing a soil study, I opted for relocation since I live at the end of the street that collapses because of the irrigation canal behind the house, Lake Guayabal, is the area where the house is, which according to them has to be built on site and is full of termites, because I have an empty house next to mine with trees that are full of termites [as well as] the house and they are building in the [REDACTED] [REDACTED] the houses with the crooked columns and everything is the same[,] it is happening like with tu hogar renace, regrettably for the few that work well, let them verify that they are taking advantage of poor people's money and I am a cancer survivor [REDACTED] below normal and they can't find me a place to stay, the cement chunks are falling off with the rebar and everything, this is [REDACTED] stop by here so you can see the people who are working on these houses who are not even contractors, what a pity P.R. this is the state we are in.

PRDOH Response:

The Puerto Rico Department of Housing (PRDOH) appreciates your comment, and regrets your situation. The Home Repair, Reconstruction, or Relocation (R3) Program is designed to provide assistance for the repair, reconstruction, or relocation of homes affected by hurricanes Irma and María. It should be noted that the R3 Program offers Optional Relocation Assistance (ORA) for those participants who need to temporarily vacate hurricane-damaged properties to allow Program-sponsored activities to be carried out and, [for those] who have been unable to secure temporary housing. The R3 Program provides assistance for rental, moving, or storage expenses to support a temporary relocation until the completion of Program-sponsored activities.

We have sent your information to the R3 Program team to better understand your situation and assist you as soon as possible. We also encourage you to visit the following link to learn the status of your case: <https://recuperacion.pr.gov/iframes/intakestatus>.

To learn more about ORA, please refer to the Optional Relocation Assistance Policy for the PRDOH CDBG-DR Program, available in English and Spanish, at <https://recuperacion.pr.gov/en/download/optional-relocation-assistance-policy/> (English) and <https://recuperacion.pr.gov/download/politica-de-asistencia-para-reubicacion-opcional/> (Spanish). For more information about the R3 Program, visit the program web page, available in English and Spanish at <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/r3/> (Spanish).

010	Comment ID:	11/27/23_WP_I_Marisol Cintron(2)
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Comment: *Case number [REDACTED] sent you photos before this one and what is happening in the house.*

PRDOH Response: Thank you for your comment. We have forwarded your information to the Repair, Reconstruction, or Relocation (R3) Program team to address your situation. However, we encourage you to visit the following link to check the status of your case: <https://recuperacion.pr.gov/iframes/intakestatus>. You can also request the status of your case by sending an email to infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by postal mail to: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365.

011	Comment ID:	11/27/23_WP_I_Evelyn(1)
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Comment: *3rd amendment to the CDBG-MIT action plan. It's better than before x it's good that they help people more to get assistance. Always thinking about our people. Thank you for your support and commitment to helping others.*

PRDOH Response: The Puerto Rico Department of Housing (PRDOH) appreciates your support of the programs designed with the CDBG-MIT funds. 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 at <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

012	Comment ID: 11/27/23_WP_I_Liza S. Núñez Avilés(1)
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CDBG-MIT Community Resilience Photovoltaic Energy
 My mother, Rosalina Avilés Cruz, whom I represent, obtained one of the tickets, we have submitted all the documentation and, by the end of September, we were assured that after the environmental inspection was favorable[,] the solar panels would be installed before the end of 2023. To my surprise, even after my mother submitted proof that the CRIM gave her a number and exemption. They denied us the assistance. We ask for reconsideration. Since we even had to make some sacrifices to get the roof treated before the upcoming installation. My mother is the sole owner of her home for the past 50 years, since it was built.

Comment:

My suggestion is that each case be evaluated individually. Since Hurricane María, it was revealed that many homes in rural areas were built on land they owned but they do not currently have a Property Deed.

PRDOH Response:

Thank you for your participation during the public comment period for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial). According to the information provided in your comment, the Puerto Rico Department of Housing (PRDOH) understands that you are referring to the Community Energy and Water Resilience Installations – Households (CEWRI-HH), which consists of two subprograms: the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), commonly known as the Solar Incentive Program. We have notified the CEWRI-HH Program about your situation to obtain more information and address your case. However, please note that CEWRI-HH Program applicants have the opportunity to submit a Program-Based Reconsideration with the Program or an Administrative Review directly with PRDOH to challenge any determination issued by the CEWRI-HH Program. You must submit your Program-based Reconsideration Request or Administrative Review Request, in writing, within twenty (20) calendar days from the date a copy of the Program determination notice was filed in the record of the agency. When submitting your Reconsideration Request, we encourage you to include a full description of the specific facts or circumstances, as well as any supporting documentation to justify your request (emails, documents received and submitted to the program, etc.). For more details about the CEWRI-HH Program reconsideration process, visit the PRDOH website where you will find the Program Guides, available in English and Spanish, at <https://recuperacion.pr.gov/en/download/new-energy-program/> (English) and <https://recuperacion.pr.gov/download/programa-nueva-energia/> (Spanish).

013	Comment ID: 11/27/23_WP_PS_Arvada Corporation_Arvada Corp.(1)
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Comment: *Respectfully request Storm Proof Container Homes be considered as part of the CDBG program for the replacement or substitution of damaged or destroyed homes just as is being done with PVC structures, etc.*

PRDOH Response: We appreciate your recommendation for the implementation of the recovery and mitigation efforts under the CDBG-DR and CDBG-MIT Programs. As the agency in charge of administering the CDBG-DR and CDBG-MIT funds, the Puerto Rico Department of Housing (PRDOH) is responsible for implementing construction methods that emphasize quality and durability. All rehabilitated or newly constructed housing built with CDBG-DR and CDBG-MIT funds must comply with established federal and/or local construction requirements and standards. This ensures that beneficiaries are provided with a safe and resilient home in the event of future disasters, in accordance with industry standards in Puerto Rico. If you want to learn more about construction standards under CDBG-MIT, we encourage you to visit the PRDOH website, available in English and Spanish, at: <https://recuperacion.pr.gov/en/cdbg-mit/> (English) and <https://recuperacion.pr.gov/cdbg-mit/> (Spanish).

014	Comment ID:	11/27/23_WP_I_Juan I Rodríguez burgos(1)
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Comment: *You have a good plan to carry out*

PRDOH Response: We appreciate your support of the mitigation efforts led by the Puerto Rico Department of Housing (PRDOH) to ensure the resilience of Puerto Rico's communities against future disasters. To stay informed about the programs and future assistance available under the CDBG-MIT Programs, visit the PRDOH web page, available in English and Spanish, at: <https://recuperacion.pr.gov/en/cdbg-mit/> (English) and <https://recuperacion.pr.gov/cdbg-mit/> (Spanish). You may also obtain more information by contacting infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by postal mail to: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365.

015	Comment ID:	11/28/23_WP_I_Andrés G Pérez de Jesús(1)
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Comment: Solar panels.

PRDOH Response: The Home Energy Resiliency Improvements Program (CEWRI-HERI Subprogram), also known publicly as the New Energy Program, under the CDBG-MIT Action Plan offers assistance to eligible households for the installation of Photovoltaic Systems (PVS) with Battery Storage Systems (BSS) to cover your energy needs.

On January 31, 2024, the New Energy Program conducted its final round to provide assistance to households with a family income below 80% of the area median income (AMFI). If you received a ticket, you have until May 31, 2024, to complete your application by submitting the required documentation at the following link: <https://recuperacion.pr.gov/iframes/CEWRI-UI.html>. We urge you to stay tuned to the PRDOH CDBG-DR/MIT Housing website at <https://recuperacion.pr.gov/welcome/en/index.html> (English) and <https://recuperacion.pr.gov/welcome/> (Spanish) for more information on this and other programs.

016	Comment ID:	11/28/23_WP_I_Sandra L Rodriguez(1)
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Comment: *I very much agree with the 3rd [amendment] to the CDBG-MIT program in which I participated, and it is a very important assistance.*

PRDOH Response: The Puerto Rico Department of Housing (PRDOH) appreciates your support for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial) for implementing programs and projects to mitigate risks and reduce losses in the event of future disasters. We encourage you to visit the PRDOH web page to stay informed about the CDBG-MIT Program services, available in English and Spanish, at <https://recuperacion.pr.gov/en/cdbg-mit/> (English) and <https://recuperacion.pr.gov/cdbg-mit/> (Spanish). Likewise, you may contact us through infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by postal mail to: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365.

017	Comment ID:	11/28/23_WP_I_Mariam Molina Rivera(1)
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Comment:

What has happened with the allocation of solar panels?

The Puerto Rico Department of Housing (PRDOH) appreciates your comment. Through the CDBG-MIT Action Plan, PRDOH designed the Community Energy and Water Resilience Installations – Household Program (CEWRI-HH), which consists of two subprograms: the Home Energy Resiliency Improvements Program (CEWRI-HERI Subprogram), commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), also known as the Solar Incentive Program. Both programs offer financing for the installation of Photovoltaic Systems (PVS) with Battery Storage Systems (BSS). However, the CEWRI-HERI Program directs its assistance to meet the energy needs of Low- and Moderate-Income (LMI) households, while the CEWRI-IP Program is designed to serve households with an Area Median Family Income (AMFI) of up to two hundred percent (200%) who have ownership or proprietary interest in a single-family structure that is their primary residence. Both programs conducted their first ticketing round, where a ticket was given to individuals who met the initial screening criteria prior to submitting a completed application to the program.

PRDOH Response:

On January 31, 2024, the New Energy Program conducted its final round to provide assistance to households with a family income below 80% of the area median income (AMFI). If you received a ticket, you have until May 31, 2024, to complete your application by submitting the required documentation at the following link: <https://recuperacion.pr.gov/iframes/CEWRI-UI.html>. We urge you to stay tuned to the PRDOH CDBG-DR/MIT Housing website at <https://recuperacion.pr.gov/welcome/en/index.html> (English) and <https://recuperacion.pr.gov/welcome/> (Spanish) for more information on this and other programs.

If you received a ticket and completed the application process under the CEWRI-HERI or CEWRI-IP, we recommend that you visit the corresponding program portal to complete or check the status of your application. If you applied for the CEWRI-HERI Program, visit the following PRDOH web page to know more about your application at <https://nuevaenergia.pr.gov/tu-solicitud.html>. If you received a ticket from the CEWRI-IP Program, visit the following PRDOH web page to complete or check the status of your application at <https://incentivosolar.pr.gov/form.html>.

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

at <https://www.incentivosolar.pr.gov/en/> (English) and <https://www.incentivosolar.pr.gov/> (Spanish).

018	Comment ID:	11/28/23_WP_I_Carlos Delgado(1)
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Comment: *They can stick their assistance where the Sun doesn't shine, I tried several times and you never gave me the opportunity, that's what I think of your assistance.*

PRDOH Response: The Puerto Rico Department of Housing (PRDOH) regrets your situation. Your comment fails to provide information identifying the program you tried to apply to. However, we encourage you to contact the PRDOH team by calling 1-833-234-2324 or TTY 787-522-5950, by email to infoCDBG@vivienda.pr.gov, or by regular mail to the following address: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365. We can help you understand your situation and guide you regarding the programs available under the CDBG-DR and CDBG-MIT funds.

019	Comment ID:	11/28/23_WP_I_Energia solar(1)
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Comment: *I was eligible and submitted everything. They came to my house, they took pictures, did everything. But they haven't put up the panels. It's needed because my mother has several conditions.*

PRDOH Response: Based on the information provided in your comment, we understand that you are referring to the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program. The CEWRI-HERI Program team was notified of your situation to provide you with a status of your application and any assistance needed to complete the installation process. At PRDOH, we are committed to addressing energy needs to ensure the well-being of the most vulnerable Puerto Rican families. To learn about the status of your application, we encourage you to visit the PRDOH website at <https://nuevaenergia.pr.gov/tu-solicitud.html>. You may also contact the PRDOH team by calling 1-833-234-2324 or TTY 787-522-5950, by email to infoCDBG@vivienda.pr.gov, or by regular mail to: Puerto Rico CDBG-DR/MIT Program, PO Box 21365 San Juan PR 00928-1365.

020

Comment
ID:

11/28/23_WP_I_Israel A Alonso Rodriguez(1)

Comment:

The intention behind the funds for the CDBG-MIT program is good, the problem is how the solar panel companies in PR want to take advantage of the client and the funds that are approved. [In] my case, for example; the cost per solar equipment is \$37,000 for 25 years, which is not viable for me who lives alone on the miserable government pension and who may not live another 25 years. However, a small company here quotes me for equipment similar to what Widmar(sic) and Planet Solar offer me for only \$9,000 dollars and with similar warranties. But the most curious detail of this application process is that Widmar(sic) already knew what they were going to loan me without having finished it. Something is not right about this and, as always, the most humble of us cannot gain from the benefits of the program and we pay the consequences. How is it possible that I have to get into such a large debt if there are other alternatives to purchase a similar and much cheaper product.

PRDOH Response:

According to the information provided in your comment, the Puerto Rico Department of Housing (PRDOH) understands that you are referring to the Community Energy and Water Resilience Installations - Household Program (CEWRI-HH) under CDBG-MIT funds, which is organized into two subprograms: the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), also known as the Solar Incentive Program. Both subprograms provides assistance to eligible households for the acquisition and installation of Photovoltaic Systems (PVS) with Battery Storage Systems (BSS). While the CEWRI-HERI Program is dedicated to meeting the energy needs of Low- to Moderate-Income (LMI) households, the CEWRI-IP Program provides services to households with an Area Median Family Income (AMFI) of up to two hundred percent (200%), who have ownership or proprietary interest in a single-family structure that is their primary residence. Prior to launching a round, PRDOH conducts an independent cost estimate to verify the market costs of the systems. PRDOH uses this information to establish the Reference Costs for each round, which are included in the Round Reference Guide published on the PRDOH website before a round is held. Note that applicants for the CEWRI-HERI and CEWRI-IP Program must contact any of the Renewable Energy Installation Companies (REIC) approved by the Program to obtain a detailed quote estimating the cost of equipment and installation services and select the most favorable one. In the CEWRI-HERI Subprogram, the quotation will be required as part of the admission package when submitting your official application. Under the CEWRI-IP Subprogram, tickets were only distributed to those eligible individuals who had an Installation Contract with one of the REICs.

If you are a CEWRI-HERI applicant, visit the following PRDOH website to know more about the status of your application: <https://nuevaenergia.pr.gov/tu-solicitud.html>. If you are a participant in the CEWRI-IP Program, visit the following PRDOH web page to complete or learn more about the status of your application: <https://incentivosolar.pr.gov/form.html>.

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

021	Comment ID: 11/29/23_WP_I_Hernandez Family(1)
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Comment:

Why not to include within CDBG funds for families that suffered lost by Hurricanes Maria and Fiona and Insurance or FEMA approved just a small portion for repairs. One (FEMA) leaving the responsibility to the other (Insurer). Most of us, received a loan from SBA during Maria's hurricane and still paying that huge amount of loan without receiving a real help on that. In my case, we have one of our kid that is a cancer patient and neither that was a merit to receive FEMA's help, thus ended with a huge SBA loan to repair and continue our lives. Of course, that life now with two mortgage loans (Bank + SBA). Also, why these funds in PR has the limitation of Income under the normal limitation of income that usually US Government give that normally is 75,000 Individual or 150,000 couple jointly together ? This is a second barrier to worker class in the Island. My suggestion is to add a session for the CDBG funds to be received by families with SBA loans resulted from a major event like a hurricane and these funds to be applied directly to these loans as a payment to the principal balance regardless of the income of the family to avoid discrimination that is what US Housing is doing right now: discriminating against worker families. (or at least the limitation of income should be 150,000 (jointly together) at the time of the event (the hurricane) when the SBA loan was taken.

PRDOH Response:

Thank you for your comment. As the managing agency of the CDBG-DR and CDBG-MIT funds, the Puerto Rico Department of Housing (PRDOH) is responsible for implementing programs and projects to address the unmet recovery and mitigation needs of Puerto Rican families. Note that the CDBG-DR and CDBG-MIT funds are two different allocations. CDBG-DR funds respond to the significant damages Puerto Rico sustained from Hurricanes Irma and Maria, while CDBG-MIT funds are used to address hazard mitigation needs for future disasters.

The Home Repair, Reconstruction, or Relocation (R3) Program under CDBG-DR funds offers a maximum grant of \$60,000 to fund repair activities for eligible homes damaged by hurricanes Irma and María. However, the R3 Program has closed its applications because it has reached the limit of its available financing capacity.

The Single-Family Housing Mitigation Program (SFM) is one of the programs available under CDBG-MIT funds. PRDOH designed the SFM Program to provide mitigation assistance to Low- to Moderate-Income families whose primary residence is located in a high-risk area, as determined by PRDOH. We encourage you to contact or visit one of the intake centers located in different parts of Puerto Rico to verify if your home is located in one of the areas identified as high risk. This will help determine your eligibility for

assistance under the SFM Program. To obtain information to contact the SFM Program Centers, visit the PRDOH website, available in English and Spanish, at <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English) or <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish).

Note that, per federal regulation, 70% of CDBG-DR funds must benefit low- and moderate- income populations. For CDBG-MIT funds it is 50%. If you want to verify the income limits related to Program eligibility, please visit the following link: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/>. These income limits are reviewed and/or modified on a yearly basis by the United States Department of Housing and Urban Development (HUD).

CDBG-DR and CDBG-MIT funds are a last resort for funding recovery and hazard mitigation. As such, PRDOH must comply with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), which prohibits individuals, companies or other entities from receiving federal funds to cover all or part of a loss for which it has already received financial assistance from another program, private insurance, charitable assistance, or other source. Therefore, PRDOH is responsible for reviewing and preventing duplication of benefits. For more information on this topic, we encourage you to check the Duplication of Benefits Policy, available in English and Spanish, at <https://recuperacion.pr.gov/en/download/duplication-of-benefits-policy/> (English) and <https://recuperacion.pr.gov/download/politica-sobre-la-duplicacion-de-beneficios/> (Spanish).

022	Comment ID: 12/02/23_WP_I_Raul Gomez Abreu(1)
Comment:	<p><i>CDBG-MIT: you have to make sure that people are satisfied. There were things done on the property that we did not agree with, while in other places they were done.</i></p> <p><i>Agencies and contractors did not appear when we had complaints. Work with LUMA must be completed. Currently, we have been paying for energy that we produce for LUMA for 6 months and LUMA sees it as consumption and not as credit, since the paperwork is not completed.</i></p>
PRDOH Response:	<p>According to the information provided in your comment, the Puerto Rico Department of Housing (PRDOH) understands that you are referring to the Community Energy and Water Resilience Installations - Household Program (CEWRI-HH) under CDBG-MIT funds, which is organized into two subprograms: the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), more commonly known as the Solar Incentive Program. The CEWRI-HH Program provides assistance to eligible households for the acquisition and installation of Photovoltaic Systems (PVS) with Battery Storage Systems (BSS). According to the CEWRI-HH Program Guidelines, all PVS and/or BSS awarded by the program must submit a Registration of Distributed Generation System with Capacity of 25 kW or Less to the Power Grid</p>

Operator. This registration must be executed through the expeditious processes provided by the Puerto Rico Energy Public Policy Act, Law No. 17-2019, as amended, 22 LPRA § 1141. Note that PRDOH is responsible for ensuring that the applicant and/or its installer have complied with submitting the Registration to the Power Grid Operator. The Power Grid Operator will notify the determination. On the other hand, please note that, to disburse the CEWRI-HH Program grant funds, PRDOH will evaluate the Award Disbursement Claim package, which includes a copy of the PVS and/or BSS warranty package, provided by the REIC and approved by the Program for the Applicant. Likewise, before a program case is closed, the PRDOH team will contact the applicant to notify if there is any additional information necessary to complete the process. Once the Program confirms that all levels of quality assurance and quality control have been completed, a Program Final Notice will be issued and the application will be considered closed. To learn more about the CEWRI-HH Program, visit the PRDOH web page, available in English and Spanish, at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish).

023	Comment ID:	12/05/23_WP_I_Juan R Meléndez Bermudez/ Margarita Arroyo Meléndez(1)
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Comment: *Community Energy and Water Resilience Installations Program CDBG-MIT Program*
They visited the home on July 7, 2023 for an environmental inspection and have not yet issued the report. We are waiting for a statement from PRDOH.

PRDOH Response: The Community Energy and Water Resilience Installations - Household Program (CEWRI-HH) consists of two subprograms: the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program, and the Incentive Program (CEWRI-IP Subprogram), more also known as the Solar Incentive Program. Both programs offer financing for the installation of Photovoltaic Systems (PVS) and Battery Storage Systems (BSS) for eligible households with energy needs. Your comment was shared with the CEWRI-HH team so they can provide you with the status of your application and any other information necessary to complete the process. If you applied for the CEWRI-HERI Program, visit the following PRDOH web page and learn more about your application at <https://nuevaenergia.pr.gov/tu-solicitud.html>. If you received a ticket from the CEWRI-IP Program, visit the following PRDOH web page to complete or check the status of your application at <https://incentivosolar.pr.gov/form.html>.

024	Comment ID:	12/06/23_E_I_Nelson Boulogne(1)
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Comment:

Good afternoon, This is Nelson Boulogne, resident of Vieques. I am sending a message to see how the Department of Housing can accept recommendations for the mitigation plan and to see how some communication can be improved for Vieques merchants to have accessibility programs such as SBF funds. Since hurricane Maria, the Department of Housing has not come or sent personnel to provide guidance on this type of subsidy. For us to be resilient, we must focus our efforts on giving opportunities to merchants who were established before and after Hurricane María. To have a better quality of life. I understand that the Governor signed a law to create a socioeconomic council that includes the development of Vieques, but it is important to know that I tried to help the community of local merchants access the SBF fund grant, but we were denied. I think it is important to separate CDBG funds to help local merchants in Vieques and be able to do a pilot plan to help reactivate the economy. People like me are willing to help and make proposals to create an economy. We have the natural resources to develop projects aimed at the sea economy, tourism, but as indicated, we do not have physical infrastructure in the docks of southern Vieques since Hurricane María and now Fiona. I have a captain and commercial fishing license, my focus is on nautical tourism and being able to create jobs for young people, but I tried to access funds like SBF to help others and due to lack of information we could not. I ask you to help us channel an idea and a plan to promote the development of Vieques in commerce and mitigation, creating a self-sustaining economy. I would appreciate any help you can provide. Nelson E. Boulogne [REDACTED]

PRDOH Response:

The CDBG-DR and CDBG-MIT funds, administered by the Puerto Rico Department of Housing (PRDOH), are grants awarded by the Department of Housing and Urban Development (HUD) that fulfill different purposes. CDBG-DR funds are focused on providing recovery assistance to communities affected by hurricanes Irma and María, while CDBG-MIT funds are aimed at implementing mitigation strategies that reduce risks and losses from future disaster events. Among the programs available under the CDBG-DR Action Plan for Recovery from hurricanes Irma and Maria, PRDOH established the Small Business Financing Program (SBF), designed to provide assistance to small businesses affected by the hurricanes. Please note that the SBF Program has closed its application intake. However, PRDOH will take into consideration your recommendations for the implementation of CDBG-DR and CDBG-MIT projects and programs aimed towards the economic development sector. We also encourage you to visit the PRDOH webpage, available in English and Spanish, to learn more about the benefits of the recovery and mitigation programs at: <https://recuperacion.pr.gov/welcome/en/home/> (English) and <https://recuperacion.pr.gov/welcome/home/> (Spanish). You may also contact us by calling 1-833-234-2324, by email at infoCDBG@vivienda.pr.gov, or by regular mail at the following address: CDBG-DR/MIT Program Puerto Rico, PO Box 21365, San Juan, PR, 00928-1365.

025 | Comment ID: 12/13/23_WP_I_Jose Rivera Colón(1)

Comment: CDBGDR Funds
Very good diligent service

PRDOH Response: The Puerto Rico Department of Housing (PRDOH) appreciates your support of the recovery efforts executed under CDBG-DR funds. To stay informed about the projects and services available under CDBG-DR funds, visit the PRDOH web page, available in English and Spanish, at: <https://recuperacion.pr.gov/en/cdbg-dr/> (English) and <https://recuperacion.pr.gov/cdbg-dr/> (Spanish).

026 | Comment ID: 12/13/23_WP_PS_Winmar home_Jose Rivera Colón(1)

Comment: CDBG very good service, excellent installation, and good orientation
CDBG. Good service, very attentive and helpful

PRDOH Response: We appreciate your support in the implementation of CDBG-DR and CDBG-MIT funds for recovery and risk mitigation against future disasters.

027 | Comment ID: 12/21/23_WP_PS_Montblanc PR Associates, L.P._Franklin Hess(1)

Comment: *Montblanc PR Associates, L.P., the owner of a 128-unit affordable housing property in Yauco that was so damaged by the January 2020 earthquake that all of its residents still remain displaced, respectfully requests that the draft Third Substantial Amendment to the CDBG-MIT Action Plan be modified to include assistance for multifamily affordable rental housing, as there is currently no such assistance available to properties of this type that were damaged by the earthquake. 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.

PRDOH Response:

We appreciate the participation of Montblanc PR Associates during the public comment period for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial). The Puerto Rico Department of Housing (PRDOH) acknowledges the importance of allocating funds to assist in the execution of affordable housing projects. These projects provide low- to moderate-income families the opportunity to purchase a safe home. Your recommendations have been registered and will be considered in the development of future initiatives aimed at supporting projects of this nature. To stay informed about CDBG-DR and CDBG-MIT funding opportunities and services, visit the PRDOH web page, available in English and Spanish, at: <https://recuperacion.pr.gov/en/cdbg-mit/> (English) or <https://recuperacion.pr.gov/cdbg-mit/> (Spanish).

028	Comment ID:	12/22/23_WP_NGO_Firmes Unidos y Resilientes con la Abogacía, Inc. (FURIA)_Nayda Bobonis Cabrera(1)
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SUBJECT: COMMENTS ON 3RD AMENDMENT TO THE CDBG-MIT ACTION PLAN (SUBSTANTIAL)

Greetings,

Comment:

On behalf of our organization Firmes, Unidos y Resilientes con la Abogacía, Inc. (FURIA) we hereby submit our comments on this third substantial amendment to the CDBG-MIT Action Plan. We are a non-profit organization that has, since its founding, been accompanying community leaders throughout the archipelago in strengthening and developing resilience in their communities. We achieve this through methods such as participatory advocacy to ensure that the claims of all individuals and groups can be truly heard and addressed on equal terms.

One of the main issues we frequently discuss is the management and oversight of the recovery funds allocated to Puerto Rico and how these are addressing the needs that communities have faced after the multiple disasters we have experienced as a country. Our primary interest is to ensure that aid arrives where it is needed and that the processes are fair

and accessible to those communities that have been rendered vulnerable. This is why once again we are joining efforts to contribute to the optimization of the CDBG-MIT Action Plan through our comments and recommendations on each of the programs affected by the amendment.

Single-Family Housing Mitigation Program

- I. *In the "Relocation" subsection, we observed that cooperatives were eliminated as an option for the relocation of eligible families, and the text does not provide any justification for the elimination of this option. However, we believe it is ideal to keep this possibility available for families who, after receiving housing counseling, opt for this option. Puerto Rico is experiencing a rise and growth of housing cooperatives, particularly to address the lack of accessible and safe housing options, so turning to this model can be a cost-efficient solution. We understand that this option should remain in the Plan.*
- II. *We consider it appropriate to increase the maximum allocation for photovoltaic and water storage systems granted under the SFM Program since we recognize that the costs of these systems can be high and burdensome for eligible families in this program. However, we recommend keeping other potential funding sources in mind for the same purpose, so that the funds for this program can impact the greatest number of families possible who still face a housing need.*

Social Interest Housing Mitigation Program

- I. *This amendment proposes to add general local government units/municipalities (including departments and divisions) as eligible entities under the Social Interest Housing Mitigation Program. It is specified that this eligibility will only be applicable under the reserve for public facilities, which includes approximately \$15 million for the "substantial reconstruction or rehabilitation of publicly owned facilities and buildings for the purpose of using them as multifamily unit buildings to serve socially vulnerable populations."*
We consider the initiative to rehabilitate public facilities for housing purposes to be very necessary and pertinent. We think that it will be of utmost importance for the Action Plan to clarify what role PRDOH will play in the administration of these facilities. Furthermore, we mainly recommend that you ensure full compliance with these projects from their planning stage to the distribution of these homes. It will be extremely important to establish what the eligibility criteria for benefiting from this opportunity based on the priority populations for this program and to give special priority to those individuals or families who lost their homes due to natural disasters and who have not yet achieved adequate reconstruction, including participants in CDBG-DR programs.

Multi-Sector Community Mitigation Program

- I. *It is of great importance to us that in the execution of the program, both the autonomy of individuals and communities are protected regarding the possibility of relocating and the prevalence of their social fabric. Such a holistic community perspective cannot be lost, as mentioned in the Program Description.*
- II. *This substantial amendment seeks to eliminate the figure of the Targeted Community Representative in the Participatory Design processes. We find this action to be appropriate for ensuring citizen participation in decisions-making about their future. The possibility of community members and organizations to participate on equal terms will also facilitate that all interested parties have the opportunity to be adequately informed about the risks and, based on that, make a collective decision about the next steps.*
- III. *We call for the inclusion in the CDBG-MIT Action Plan of specific methods through which interested parties can participate in the Participatory Design, and for it to be established that the determinations of the communities will be binding regarding the decision made on the matter.*
- IV. *We support the idea that, as established in the "Program Priorities" subsection, PRDOH reviews the Municipal Recovery Plans to identify community relocation projects already underway so that integrated efforts are made to meet both the objectives of CDBG-MIT as well as CDBG-DR. It will be important for these projects to also comply, or to have complied, with an exhaustive Participatory Design process with the affected communities.*
- V. *In the "Distribution Method" subsection, we noticed that, under this amendment, PRDOH could "use reasonable criteria to select a Subrecipient, including, but not limited to, a direct selection process." In addition, the "Eligible Applicants" subsection is later deleted. We understand that eligibility to be a subrecipient of this program is too open, and we urge you not to eliminate the "Eligible Applicants" subsection. We do not find it appropriate for PRDOH to have a direct selection process without clear eligibility criteria to be a Subrecipient of a fund like this.*

Community Energy and Water Resilience Installations Program

- I. *We have no reservations regarding the proposed amendment to this program. Nevertheless, we want to emphasize a call we made in our previous comments on the CDBG-MIT Action Plan and its past amendments. Although this is a program for community energy and water installations, the Plan continues to focus on prioritizing energy efforts and neglects community aqueducts. We attest that community aqueducts are extraordinarily helpful in developing resilience and face great challenges at an economic and administrative level, which is why their prioritization as an eligible activity is extremely*

important and necessary. Additionally, we acknowledge that there are several other initiatives equally aimed at energy installations that could be beneficial for these communities.

General feedback:

- I. Throughout the Plan, it is mentioned on several occasions that anti-displacement measures will be taken in the planning and execution of the programs. However, we understand that none of those presented measures manage to identify or describe in a precise and comprehensive manner how displacement processes are occurring in the Puerto Rican reality at the local and state level. We recommend that all programs include this subsection on anti-displacement measures and include, as part of the subsection, what displacement risks are currently faced through each of the programs proposed here and how each program will strive to and will focus on preventing and mitigating those risks in a specific manner.*
- II. We recommend that each of the programs integrate a Participatory Design approach, as included in the Multi-Sector Community Mitigation Program, where the real and direct participation of communities in the programs and projects that will affect them is ensured.*
- III. We suggest integrating all planning processes that are being worked on through the different government agencies, in addition to the CDBG-MIT and the planning programs under CDBG-DR; the projects under COR 3; and the Climate Change Mitigation, Adaptation, and Resilience Plan, among others. This is important to: 1. recognize and include what has been achieved through the processes that have been carried out, 2. ensure the best possible use of public funds, and 3. have a resilient planning process that works collaboratively and contributes to a comprehensive national plan. As long as the work of all government agencies that in some way address recovery and mitigation in our communities is not aligned, it will be more challenging to implement the outcomes of these processes.*

We hope that these recommendations can be taken into consideration, and we will be awaiting the implementation of the proposed changes to the CDBG-MIT Action Plan. We are at your disposal to address any questions or comments. If you have any questions, you can contact us at 787-210-6189 or email nbobonis@gmail.com or furia.puertorico@gmail.com.

Atty. Nayda Bobonis Cabrera
Executive Director

Dear Nayda Bobonis Cabrera, Esq.

PRDOH Response:

The Puerto Rico Department of Housing (PRDOH) appreciates the support and recommendations presented by the Firmes, Unidos y Resilientes con

la Abogacía, Inc. (FURIA) organization for the 3rd Amendment to the CDBG-MIT Action Plan.

The Single-Family Housing Mitigation Program (SFM) is designed to provide mitigation assistance to households that are immediately threatened and uninhabitable due to damage caused by recent disasters or hazardous events. As part of the services provided by the SFM Program, PRDOH offers relocation vouchers for those participants who have households located in a high-risk area. Participants who receive a relocation award may select an existing or under-construction home outside of a high-risk area, as long as title to the property is transferable to the applicant.

As part of the benefits of the program, PRDOH also offers financing for the installation of resilient solar energy and water supply systems. This measure aims to strengthen the resilience of households against future disruptions to electricity and/or water services. Note that, as the agency responsible for administering CDBG-MIT funds, PRDOH must comply with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), which 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. For this reason, PRDOH will make sure to evaluate each project to avoid the duplication of benefits. If you would like to learn more about the SFM Program, please visit the PRDOH web page, available in English and Spanish, at: <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). You can also visit the PRDOH web page to learn about the Duplication of Benefits Policy, available in English and Spanish, at <https://recuperacion.pr.gov/en/download/duplication-of-benefits-policy/> (English) and <https://recuperacion.pr.gov/download/politica-sobre-la-duplicacion-de-beneficios/> (Spanish).

The Social Interest Housing Mitigation Program (SIHM) provides assistance through the financing of housing projects that address the mitigation needs of the most vulnerable populations and protected classes. As part of the changes proposed under the 3rd Amendment to the CDBG-MIT Action Plan, PRDOH included a reserve for the reconstruction or rehabilitation of publicly owned facilities and buildings for use as multifamily unit buildings to serve socially vulnerable populations. As program administrator, PRDOH will provide financial assistance for the construction, reconstruction, or rehabilitation of the projects. The government entity will be in charge of managing the public facility. This will include the provision of services and overall management to ensure access to adequate housing for the most vulnerable families.

The Multi-Sector Community Mitigation Program (MSC) is designed to assist vulnerable communities located in high-risk areas to relocate to a new, safe community. Communities that participate in the program will enter into a Participatory Design process facilitated by PRDOH. During this process, PRDOH contemplates collaborating with community

organizations or nonprofit organizations for the proper implementation of the relocation project. These communities previously required the assistance of a Targeted Community Representative (TCR); however, this requirement was removed in order to work directly with communities and interest groups. In other words, the eligibility criteria for applicants were eliminated because they were initially established for entities interested in participating as a TCR. Regarding the eligibility criteria for the program's subrecipients, PRDOH modified the amendment to clarify that nonprofit organizations or community-based organizations that serve as subrecipients for the execution of the projects will be directly selected.

Regarding the Community Energy and Water Resilience Installations Program subprograms, PRDOH modified the Home Energy Resilience Improvements Program (CEWRI- HH) to focus on addressing the energy needs of homes under the 1st Amendment to the CDBG-MIT Action Plan (Substantial). This approach provides PRDOH with the opportunity to centralize water resilience efforts under the Single-Family Housing Mitigation Program and Community Installations Subprogram (CEWRI-CI). The CEWRI-CI subprogram provides members of selected communities with the opportunity to acquire and install Photovoltaic Systems (PVS), Battery Storage Systems (BSS), and Water Storage Systems (WSS), thus contributing to strengthening the resilience and sustainability of these areas.

With regards to minimizing the displacement of families, PRDOH is responsible for ensuring proper compliance with the provisions of the Uniform Relocation Act of 1970 (URA), as amended, and Section 104(d) of the Housing and Community Development Act of 1974 (HCDA), except where HUD has provided relief or alternative requirements. As detailed in the CDBG-MIT Action Plan under the Plans to Minimize Displacement and Ensure Accessibility section, *"the primary purpose of these laws and regulations is to provide uniform, fair, and equitable treatment to individuals whose properties are acquired and who are displaced in connection with federally funded projects."* For more details on general relocation requirements, visit the PRDOH web page to consult the Uniform Relocation Assistance Guide and Residential Anti-Displacement and Relocation Assistance Plan (URA & ADP Guidelines), available in English and Spanish, at <https://recuperacion.pr.gov/en/download/ura-adp-guidelines/> (English) and <https://recuperacion.pr.gov/download/guias-ura-adp/> (Spanish).

Regarding your suggestion to apply the Participatory Design process to all CDBG-MIT Programs, note that the implementation of this strategy will depend on the specific design of each program. In accordance with the HUD requirements in notice 84 FR 45838, 45846, PRDOH is responsible for conducting interagency coordination between state and local departments and divisions involved in the design and implementation of mitigation planning projects. The aim of this coordination is to maintain consistency and integrate CDBG-MIT activities with current efforts. Because of this, PRDOH worked with different federal and local agencies and other interest groups to ensure that the programs developed under

the CDBG-MIT Action Plan effectively address the mitigation needs of Puerto Ricans.

The PRDOH team is committed to implementing the best mitigation strategies so as to ensure a more resilient Puerto Rico in the event of future disasters. We appreciate FURIA's interest and support for the development and execution of the CDBG-MIT Action Plan.

029	Comment ID: 12/24/23_WP_PS_MR Consultores_Rolando Jimenez Mercado(1)
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Action Plan - Community Development Block Grant - Mitigation Program - Comments: 3rd Amendment

Comment:

- Page 8: It is very wise to prioritize families with homes that are uninhabitable due to damage caused by disasters.
 - Page 42: For for-profit companies, I recommend replacing the expression "applicants are encouraged to seek community support" with an expression that conveys greater commitment. It could be an expression like the following: Applicants will be required to develop work plans that include community-based organizations, local agencies, leaders representing the project area, and the people to benefit, showing evidence of collaboration either through memoranda of understanding, formalized consortia, and support letters, among other resources.
 - Pages: 46-49, page 47 appears to be missing (maybe it was not printed but was included). In this section, I recommend offering an incentive (of up to \$15,000.00) to families that have incurred loans (as of 2020) with banks, cooperatives, and other financial institutions to acquire SES solar energy equipment (batteries and solar panels). It is onerous for families (called the working middle class) to pay for a SES for a number of years, particularly if the head of the household is a pensioner and/or over 65 years of age. A monetary contribution can be allocated as an incentive to families that can provide evidence of the loan granted, monthly payments, and the loan settlement date. The payment can go directly to the institution that financed the SES. It can be concluded that any family (regardless of income) that has had to take out loan(s) to enhance energy resilience at home requires financial assistance to cover the cost of the purchased equipment. This recommendation is consistent with the incentive program described on page 48, which includes a maximum allocation of \$15,000.00 or up to 30% of SES project costs. By implementing this type of assistance, it is expected that a greater number of families who have working-class members and/or pensioners will be encouraged to take the affirmative step of investing in renewable energy sources. As we enter 2024, this initiative can contribute to achieving the government's goal of Puerto Rico reaching 40% renewable energy usage by 2025 (page 45).
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- *In its entirety, the document presented is very well-prepared, with very well-developed details, and with highly realistic goals.*

The Puerto Rico Department of Housing (PRDOH) appreciates the suggestions presented by MR Consultores as part of the public comment period for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial). At PRDOH, we are committed to assisting Puerto Rican families address their mitigation needs through resilient solutions.

We appreciate your comment regarding the Single-Family Housing Mitigation Program, which aims to provide assistance to families with uninhabitable homes due to previous disasters or recent hazards that threaten the safety of the home.

PRDOH Response:

On the other hand, the Economic Development Investment Portfolio for Growth – Lifeline Mitigation Program (IPGM), an extension of the CDBG-DR Program, focuses on providing financing for private lifeline infrastructure to support risk-based mitigation needs. Entities that are interested in participating in the IPGM Program must comply with each of the established requirements to ensure that the projects address the mitigation needs of the communities that will be impacted by the proposed project. As part of the evaluation of projects, PRDOH encourages applicants to submit documentation that demonstrates community support for the proposed project. In the Initial CDBG-MIT Action Plan, PRDOH required that applicants provide documentation that evidenced community support. However, PRDOH eliminated this requirement to create greater flexibility for applicants in the 1st Amendment to the CDBG-MIT Action Plan. This change was made considering that there could be a wide variety of perspectives from interest groups regarding the implementation of a mitigation project that could benefit communities.

Regarding your recommendation for the Incentive Program (CEWRI-IP), more commonly known as the Solar Incentive Program, note that the main objective is to provide a grant for the installation of a photovoltaic system with a battery storage system for households with energy needs. The CEWRI-IP Program provides a maximum grant of \$15,000 or up to thirty percent (30%) of the home project costs, whichever is less, to fund the installation of renewable energy systems. On August 10, 2023, PRDOH held the first and only round of tickets to apply for the CEWRI-IP Program. Unlike the Home Energy Resilience Improvements Program (CEWRI-HERI Subprogram), more commonly known as the New Energy Program, CEWRI-IP Program applicants were required to have an installation agreement or contract along with an Environmental Acknowledgment and Consent Form when requesting a ticket to the program. Similarly, as part of the requirements, applicants had to confirm that installation work on the systems had not begun at the time of application. Note that if the

applicant already had a photovoltaic system but did not yet have a battery storage system, the program could provide them with a grant to acquire this system as long as they met all the requirements established in the Program Guidelines. To learn more about the CEWRI-IP Program, visit the PRDOH web page, available in English and Spanish, at <https://www.incentivosolar.pr.gov/en/> (English) and <https://www.incentivosolar.pr.gov/> (Spanish).

CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resilience against future disaster events. To learn about the services available under CDBG-MIT funds, visit the PRDOH website, available in English and Spanish, at <https://recuperacion.pr.gov/en/cdbg-mit/> (English) and <https://recuperacion.pr.gov/cdbg-mit/> (Spanish).

030	Comment ID: 12/22/23_E_NGO_Caño Martín Peña ENLACE Project Corporation_William Alexander McComrick Rivera(1)
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VIA EMAIL infoCDBG@vivienda.pr.gov

December 22, 2023
Legal Division
CDBG-DR/MIT Program
PO Box 21365
San Juan, PR 00928-1365

COMMENTS ON THE 3RD SUBSTANTIAL AMENDMENT TO THE COMMUNITY DEVELOPMENT BLOCK GRANT-MITIGATION (CDBG-MIT) ACTION PLAN

Through this letter, the "Proyecto ENLACE del Caño Martín Peña" Corporation issues its comments on the 3rd Substantial Amendment to the Community Development Block Grant Mitigation (CDBG-MIT) Action Plan for Puerto Rico.

Comment:

Page 34, second paragraph:

"Reserve for the communities of Caño Martín Peña (CMP): Located within the Municipality of San Juan, the CMP Communities as a whole are made up of an estimated 30,000 residents across eight (8) different neighborhoods or community sectors:"

Comment: The demographic figure of 30,000 residents needs to be updated. The most recent estimates from the American Community Survey (ACS 5-Year Estimates Data Profiles) indicate that the Caño communities have a population of 17,403 (DP05 ACS Demographic and Housing Estimates).

Page 34, third paragraph:

“The CMP Communities are currently living with an environmental crisis that affects more than 26,000 residents who are living below the poverty line and suffer from recurrent flooding.”

Comment: The demographic figure of 26,000 residents needs to be updated. The most recent estimates from the American Community Survey (ACS 5-Year Estimates Data Profiles) indicate that the CMP communities have a population of 17,403 (DP05 ACS Demographic and Housing Estimates).

In compliance with the established comment period, the “Proyecto ENLACE del Caño Martín Peña” Corporation and the Caño Martín Peña Land Trust submit their comments. For any clarification, please contact Mario Nunez Mercado by email at mnunez@martinpena.pr.gov or by phone at 787-729-1594.

Best regards,

*Mario Nuñez Mercado
Executive Director*

PRDOH Response:

We appreciate the recommendations and support from the Corporation “Proyecto ENLACE del Caño Martín Peña” during the public comment period for the 3rd Amendment to the CDBG-MIT Action Plan (Substantial). The purpose of the Multi-Sector Community Mitigation Program (MSC) is to provide relocation assistance to vulnerable communities located in risk areas such as floodplains, liquefaction-prone lands, and coastal areas threatened by the rise in sea level. As part of the program's projects, the Puerto Rico Department of Housing (PRDOH) included a reserve to address the mitigation needs of the residents of the Caño Martín Peña (CMP) Communities. In the description of the purpose of the reserve, two figures are included referring to the total number of residents living in the communities. In reference to the estimate of 30,000 residents, PRDOH modified the footnote to indicate that the information was obtained from Law No. 489-2004. Regarding the total of 26,000 residents mentioned in the subsequent paragraph, the narrative was adjusted to avoid mentioning a specific number, as the current total of CMP residents could change throughout the life of the grant. The PRDOH team appreciates the suggestions issued by the Corporation “Proyecto ENLACE del Caño Martín Peña. Likewise, we appreciate your commitment and collaboration in ensuring that CMP residents are provided with the opportunity to relocate to a safe and dignified community, thus promoting the economic and social development of its residents.