

## Appendix B. Waivers

PRDOH did not request a waiver to address unmet needs for 88 FR 32046, however, a MID Area expansion request was submitted and approved by HUD.



GOVERNMENT OF PUERTO RICO  
DEPARTMENT OF HOUSING

October 9, 2023

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**RE: Request for Expansion of the HUD-identified MID Area and Extension Request of the Action Plan Deadline – Puerto Rico CDBG-DR Allocation for the Recovery from Severe Storm/Flooding (DR-4649-PR) and Hurricane Fiona (DR-4671-PR)**

On May 18, 2023, the U.S. Department of Housing and Urban Development (**HUD**) published the Federal Register Notice Vol. 88 No. 96 (May 18, 2023) 88 FR 32046, which granted Puerto Rico a total of \$166.3 million in CDBG-DR funds for the recovery of Severe Storm, Flooding and Landslides (DR-4649-PR), and Hurricane Fiona (DR-4671-PR). As the Grantee of the CDBG-DR and CDBG-MIT funds for Puerto Rico, the Puerto Rico Department of Housing (**PRDOH**) submitted a consultation to HUD on July 6, 2023, regarding the possibility of expanding the HUD-identified Most Impacted and Distressed (**MID**) Area in Puerto Rico.

On July 12, 2023, HUD responded via e-mail to PRDOH that the grantee can request to add other areas to the HUD-identified MID area with data-driven analysis that illustrates the basis for designating the additional areas as most impacted and distressed. As stated in the 88 FR 32046, *“If a grantee seeks to add other areas to the HUD-identified MID area, the grantee must contact its CPD Representative or CPD Specialist and submit the request with a data-driven analysis that illustrates the basis for designating the additional area as most impacted and distressed as a result of the qualifying disaster.”*

Following the federal agency’s guidance, as well as the alternative established in the federal register notice, PRDOH hereby submits its data-driven analysis, based on the best available information to determine a

good cause for the expansion of the HUD-identified MID area to all the seventy-eight (78) municipalities in Puerto Rico.

Additionally, PRDOH seeks to request HUD's consideration for a 120-day extension for the submittal of the CDBG-DR Public Action Plan and Implementation Plan, as requested in the letter previously transmitted to HUD on September 19, 2023.

### **Background**

Using the best available information at the time, the 88 FR 32046 identified as MID areas only twenty-three (23) of Puerto Rico's seventy-eight (78). The Federal Register indicates that 80% of allocated funds be spent in these areas and provides an allocation methodology for calculating disaster impacts and unmet needs and identifying MID areas as those "counties" with more than \$10 million in serious unmet housing needs or zip codes with more than \$2 million of serious unmet housing needs. Serious unmet housing need is defined as the sum of: (1) Repair estimates for serious damaged owner-occupied housing units without insurance in most impacted areas after FEMA and Small Business Administration (**SBA**); (2) Repair estimates for seriously damaged rental units occupied by very low-income renters; (3) Repair and content loss estimates for small businesses with serious damage denied by SBA; and (4) The estimated local cost share for FEMA Public Assistance Category A – G projects.

### **Rationale and Assumptions**

This assessment diverges from the methods outlined in Appendix A: Allocation Methodology in 88 FR 32046, since the exact data and methods utilized by HUD to determine MID areas, namely, FEMA and SBA applicant-level data with registrant identifier (used to ascertain repair estimates for owner-occupied housing) and applicant-level SBA business data with number of employees and business size identifier (used to ascertain repair and content loss estimates for SBA) have not been provided to PRDOH. As such, the following assumptions were utilized herein to ascertain the most impacted and distressed areas across Puerto Rico.

Assumptions:

1. The Federal Register does not account for losses to disaster survivors who have been classified as having minor-low or minor-high damage. Failure to account for these in an assessment of impact and distress results in a significant under-estimate of community-wide distress – a challenge that Puerto Rico has been facing since prior to Hurricanes Irma and Maria and one that continues to

sideline recovery across the Island. Due to these facts, this assessment implements an approach where all disaster victims are included in the calculation.

2. Using only losses for uninsured homeowners creates a potentially serious “blind-spot” in these assessments. It is well known that homeowners insurance claims are being denied more and more frequently due to “uncovered” losses such as wind damage.<sup>1</sup> Utilizing only uninsured homeowners in the MID assessment will lead to an undercount of both damage and the number of disaster survivors requiring additional help to recover. Due to these facts, PRDOH’s assessment provides perspective from both the 1. uninsured and 2. all applicant perspectives.
3. HUD’s premise that only damage over a certain threshold (\$10 million at the county level or \$2 million at the zip code level) are identified as MID is but a single perspective on impacts – one that favors places with higher populations, more housing units, and higher inspections while discounting places with lower populations that may still have a large impact in proportional relation to their populations. This assessment provides a more comprehensive perspective on losses accounting for standardized or “relative” impacts<sup>2</sup> – a concept grounded in the idea that different places will experience losses differently and where standardization can provide meaningful comparisons between HUD-identified MIDs and places that should be recognized as MID areas.
4. HUD’s “multipliers” by disaster type (used to determine a more accurate amount of losses by “damage category”) are generalized across disasters and have been previously identified in other CDBG-DR Unmet Needs Assessments to create an underestimate of impacts and rebuilding costs. Utilizing these in the current assessment will result in a very conservative estimate of impacts where the actual impact is much higher. Although PRDOH’s assessment does not change the HUD multipliers, one should recognize that these may not be sufficient for the Puerto Rico case.
5. SBA’s home and business reports contain values for approved amount, the total amount approved for each loan applicant, and current amount, the total current loan amount accepted (drawn

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<sup>1</sup> <https://www.wsj.com/articles/hurricane-maria-exposes-a-common-problem-for-puerto-rico-homeowners-no-insurance-1505940660>

<sup>2</sup> <https://www.sciencedirect.com/science/article/pii/S2212420913000381>

down) by each loan recipient. These values are often vastly different with approved amount always equal to or higher than “current” amount. However, publicly available SBA data, which is available by year<sup>3</sup>, only summarizes total loan amount for municipalities, cities, and zip codes. This assessment must use the total approved amount which will have a negative effect on unmet needs, making it appear that unmet needs are lower than they actually are. In some cases, including this summarized HUD data results in a negative (< \$0) unmet need. Due to these facts, SBA support is not utilized in this assessment.

**Assessment of Puerto Rico’s Most Impacted and Distressed Areas**

The assessment in the following pages attempts to reproduce methods described in Appendix A of the Federal Register Allocation Notice<sup>4</sup> (FR) as closely as possible to identify Puerto Rico’s current MID municipalities but also provides several expansions on these methods, which may provide a more holistic view of impacts, unmet needs and highlights potential additional MID areas across Puerto Rico. Table 1 briefly explains the different pathways examined herein with the intention of providing enough information to explain how each analysis was undertaken and how the results of each should be interpreted.

*Table 1: Summary of analytic approaches in this assessment*

<b>Analytic Approaches</b>	<b>Summary Methods</b>	<b>Intended Output and Interpretation</b>
<u>Approach 1:</u> Reproduce FR method for MID identification	Summary of impacts to homeowners (without insurance) classified as major-low or greater damage, low-income renters, small businesses, and public infrastructure using the methods provided in the FR.	Establishing a baseline understanding of areas based on HUD’s thresholds of impacts that favor places with more people and households who were impacted and discounts places with lower populations, housing units, businesses, and infrastructure.
<u>Approach 2:</u> Reproduce FR method accounting	Summary of impacts to all homeowners classified as major-low or greater damage, all renters, all businesses,	Expanding on the baseline by providing a more inclusive assessment of housing impacts that still relies on the HUD’s thresholds of impacts

<sup>3</sup> <https://www.sba.gov/document/report-sba-disaster-loan-data>

<sup>4</sup> <https://www.hud.gov/sites/dfiles/CPD/documents/FR-6393-N-01-AAN.pdf>

<b>Analytic Approaches</b>	<b>Summary Methods</b>	<b>Intended Output and Interpretation</b>
for all owners and renters	and public infrastructure using the methods provided in the FR.	that favor places with more people and households who were impacted and discounts places with lower populations, housing units, businesses, and infrastructure.
<u>Approach 3:</u> Reproduce FR method accounting for All Loss Categories	Summary of impacts to all homeowners with any level of damage, all renters, all businesses, and public infrastructure using the methods provided in the FR.	Utilizing information on all impacted households to form the most comprehensive view of impacts that includes any damage reported to FEMA. This method still relies on HUD's thresholds of impacts that favor places with more people and households who were impacted and discount places with lower populations, housing units, businesses, and infrastructure.
<u>Approach 4:</u> Comparative Assessment Accounting for Relative Exposure and Impacts	Summarize impacts using various standardized methods, including Per Capita, Per Housing Unit, and Per Applicants for all PR municipalities in comparison to the HUD-identified MID municipalities	This method compares HUD's MID municipalities to all others using values that enable direct measurement of similarities and differences between Puerto Rico's municipalities in an empirical fashion.

Approach 1 - Reproduce FR method for MID identification.

The FR identified the majority of municipalities in the HUD-identified MID area as zip code areas. With the exception of Salinas, which was identified as a MID area by HUD, the remaining municipalities in the MID area were identified through a zip code level assessment of the data. Available FEMA Individual Assistance (IA), SBA, and FEMA Public Assistance (PA) data does not support a zip code level assessment in the current work. However, it should be noted that when replicating the FR method for identifying MID areas, Salinas did not pass the \$10 million threshold. Rather, only Toa Baja,

with > \$14 million in estimated unmet need, exceeded HUD's \$10 million threshold at the county level for inclusion as a MID area. Furthermore, presuming comparability across all municipalities using this approach and recognizing that Salinas was designated, among others, as a MID area by HUD, highlighting all of those municipalities with losses greater than current MID municipalities' losses is useful for identifying other areas that may also be MID (municipalities with blue cells in Table 2) but were simply excluded due to incomplete, inconsistent, or inaccurate data. Here, the minimal "Total FR Determined Unmet Needs" (\$1,039,337) across all municipalities identified in the FR was used to appraise all other municipalities in terms of their total loss. Municipalities with higher "unmet needs" than the \$1,039,337 across current MID areas have blue-colored cells in Table 2. This approach produced an additional 25 municipalities with greater FR Unmet Need than those already identified as MID areas. A total of 48 municipalities would be classified as MID using this approach and equally comparing current MID areas rather than implementing HUD's monetary threshold.

Table 2: Results of Approach 1 - FR Method for MID Determination

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 1: Total FR Determined Unmet Needs
Adjuntas	\$1,289,958	\$533,504	\$53,451	\$1,431,822	<b>\$3,308,735</b>
Aguada	\$245,437	\$745,152	\$181,441	\$379,517	<b>\$1,551,547</b>
Aguadilla	\$530,433	\$1,480,768	\$308,014	\$24,805	<b>\$2,344,020</b>
Aguas Buenas	\$0	\$404,800	\$145,658	\$25,092	\$575,550
Aibonito	\$0	\$1,021,056	\$182,503	\$569,561	<b>\$1,773,120</b>
Añasco	\$2,782,013	\$1,342,336	\$34,622	\$286,242	<b>\$4,445,214</b>
Arecibo	\$2,430,781	\$5,470,400	\$65,981	\$69,810	<b>\$8,036,973</b>
Arroyo	\$0	\$524,352	\$216,975	\$0	\$741,327
Barceloneta	\$498,068	\$386,304	\$226,917	\$2,647	<b>\$1,113,936</b>
Barranquitas	\$0	\$1,600,320	\$406,484	\$1,913	<b>\$2,008,717</b>
Bayamón	\$0	\$1,388,672	\$833,001	\$36,792	<b>\$2,258,465</b>
Cabo Rojo	\$1,460,784	\$2,344,896	\$688,930	\$333,082	<b>\$4,827,692</b>
Caguas	\$0	\$2,841,792	\$706,072	\$562,416	<b>\$4,110,280</b>
Camuy	\$45,881	\$147,200	\$120,894	\$49,097	\$363,072

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 1: Total FR Determined Unmet Needs
Canovanas	\$0	\$2,252,800	\$272,929	\$365,913	<b>\$2,891,642</b>
Carolina	\$0	\$1,278,464	\$1,331,929	\$0	<b>\$2,610,393</b>
Cataño	\$1,417,266	\$986,215	\$313,124	\$8,015	<b>\$2,724,619</b>
Cayey	\$0	\$505,856	\$342,697	\$149,964	\$998,517
Ceiba	\$0	\$321,856	\$5,896	\$219,000	\$546,752
Ciales	\$236,596	\$73,600	\$28,886	\$13,348	\$352,431
Cidra	\$0	\$487,360	\$98,634	\$954,918	<b>\$1,540,912</b>
Coamo	\$0	\$662,208	\$611,187	\$1,934,602	<b>\$3,207,997</b>
Comerio	\$0	\$772,416	\$104,475	\$150,782	<b>\$1,027,673</b>
Corozal	\$0	\$515,200	\$126,792	\$101,346	\$743,338
Culebra	\$0	\$0	\$79,510	\$0	\$79,510
Dorado	\$2,864,856	\$1,741,957	\$81,064	\$0	<b>\$4,687,877</b>
Fajardo	\$0	\$386,304	\$228,484	\$81,689	\$696,477
Florida	\$0	\$73,600	\$31,666	\$0	\$105,266
Guanica	\$395,714	\$450,560	\$41,072	\$49,525	\$936,871
Guayama	\$0	\$1,554,176	\$494,907	\$12,235	<b>\$2,061,318</b>
Guayanilla	\$834,924	\$616,064	\$227,553	\$0	<b>\$1,678,541</b>
Guaynabo	\$0	\$156,352	\$432,068	\$355,180	\$943,600
Gurabo	\$0	\$294,208	\$175,369	\$43,264	\$512,841
Hatillo	\$31,859	\$423,104	\$248,134	\$0	\$703,097
Hormigueros	\$3,537,942	\$2,629,184	\$46,733	\$533,417	<b>\$6,747,276</b>
Humacao	\$0	\$3,871,424	\$3,738,307	\$567,635	<b>\$8,177,366</b>
Isabela	\$265,224	\$910,656	\$128,923	\$5,083	<b>\$1,309,886</b>
Jayuya	\$1,042,512	\$441,408	\$60,704	\$3,623,490	<b>\$5,168,114</b>
Juana Díaz	\$0	\$1,664,576	\$440,240	\$16,962	<b>\$2,121,778</b>
Juncos	\$0	\$1,186,560	\$295,872	\$0	<b>\$1,482,432</b>
Lajas	\$1,435,658	\$1,167,872	\$235,753	\$14,757	<b>\$2,854,039</b>
Lares	\$229,749	\$202,304	\$85,215	\$144,380	\$661,648
Las Marías	\$134,803	\$0	\$14,151	\$302,885	\$451,840
Las Piedras	\$0	\$1,766,016	\$87,558	\$2,929,521	<b>\$4,783,095</b>
Loíza	\$0	\$607,104	\$38,517	\$0	\$645,621
Luquillo	\$0	\$184,000	\$103,879	\$0	\$287,879
Manatí	\$215,145	\$340,352	\$35,003	\$36,544	\$627,044
Maricao	\$162,636	\$119,552	\$69,142	\$0	\$351,330



Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 1: Total FR Determined Unmet Needs
Maunabo	\$0	\$275,904	\$150,825	\$13,944	\$440,673
Mayagüez	\$1,473,915	\$1,655,808	\$1,067,803	\$154,275	<b>\$4,351,801</b>
Moca	\$353,207	\$1,076,160	\$320,861	\$123,383	<b>\$1,873,611</b>
Morovis	\$339,863	\$229,952	\$53,190	\$0	\$623,005
Naguabo	\$0	\$340,352	\$80,753	\$47,290	\$468,395
Naranjito	\$0	\$873,472	\$128,164	\$0	<b>\$1,001,636</b>
Orocovis	\$0	\$1,121,920	\$88,724	\$285,800	<b>\$1,496,444</b>
Patillas	\$0	\$377,152	\$45,297	\$1,916,384	<b>\$2,338,833</b>
Peñuelas	\$389,476	\$606,912	\$157,950	\$0	<b>\$1,154,338</b>
Ponce	\$0	\$4,231,040	\$2,600,932	\$180,307	<b>\$7,012,279</b>
Quebradillas	\$141,771	\$156,352	\$22,042	\$9,039	\$329,204
Rincón	\$561,280	\$349,504	\$84,265	\$44,288	<b>\$1,039,337</b>
Río Grande	\$0	\$193,152	\$245,834	\$210,661	\$649,647
Sabana Grande	\$346,698	\$432,256	\$43,392	\$67,436	\$889,782
Salinas	\$0	\$7,842,944	\$193,078	\$0	<b>\$8,036,022</b>
San Germán	\$749,321	\$560,960	\$457,018	\$8,643	<b>\$1,775,941</b>
San Juan	\$0	\$5,086,592	\$1,407,987	\$0	<b>\$6,494,579</b>
San Lorenzo	\$36,800	\$625,600	\$297,125	\$684,945	<b>\$1,644,470</b>
San Sebastián	\$95,025	\$156,352	\$229,888	\$118,988	\$600,253
Santa Isabel	\$0	\$2,115,328	\$322,133	\$0	<b>\$2,437,461</b>
Toa Alta	\$0	\$736,000	\$329,904	\$0	<b>\$1,065,904</b>
Toa Baja	\$1,917,974	\$13,544,522	\$389,859	\$0	<b>\$15,852,355</b>
Trujillo Alto	\$0	\$404,800	\$137,250	\$0	\$542,050
Utuado	\$860,572	\$1,030,016	\$209,560	\$1,551,591	<b>\$3,651,739</b>
Vega Alta	\$816,302	\$596,164	\$528,594	\$42,499	<b>\$1,983,559</b>
Vega Baja	\$2,206,580	\$2,359,617	\$325,061	\$4,442	<b>\$4,895,700</b>
Vieques	\$0	\$36,800	\$3,926	\$0	\$40,726
Villalba	\$0	\$413,952	\$56,003	\$0	\$469,955
Yabucoa	\$0	\$1,940,288	\$181,884	\$0	<b>\$2,122,172</b>
Yauco	\$110,400	\$1,029,824	\$219,160	\$651,194	<b>\$2,010,578</b>

## Approach 2 - Accounting for All Owner/Renter Applicants Regardless of Insurance or Income Status

The federal register specifies that MID areas only include FEMA Applicants who are homeowners without insurance with the idea that homeowners with insurance will have the required support and associated funds available to them after either Hurricane Fiona, which impacted all people living in Puerto Rico, or the Severe Storms and Flooding that impacted several municipalities in north-central Puerto Rico. Hurricane Fiona was much more of a “water” event than Maria, meaning that many more insurance claims will be linked to flood waters<sup>5</sup>. Furthermore, many insurance companies are not covering wind damage,<sup>6</sup> and flooding victims will not receive insurance payouts without federal flood insurance. Hence, losses and unmet needs will be found across Puerto Rico and will not be specifically borne by those without homeowners’ insurance. Similarly, it should be recognized that all renters, not merely impoverished renters, face challenges in disaster recovery<sup>7</sup>. Renters often have limited financial resources, are frequently uninsured or underinsured, and do not have the power to decide if/when their rental unit will be repaired<sup>8</sup>. As such, it remains important to gain perspective on island-wide impacts and unmet needs for all FEMA applicants regardless of their insurance status, tenure (owner/renter), or income level.

Under this approach, accounting for all applicants using similar methods as applied to the FR reproduction of impacts and unmet needs will result in different municipality-level unmet needs and may uncover additional areas that meet or exceed those unmet need values for currently identified MIDs. Here, when highlighting those municipalities with higher than the minimum current MID unmet need of \$1,001,636, a total of 49 municipalities would be classified as MID using this approach and equally comparing between current MID areas rather than implementing HUD’s monetary threshold (Table 3).

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<sup>5</sup> <https://www.insurancejournal.com/news/national/2022/09/22/686264.htm>

<sup>6</sup> <https://www.wsj.com/articles/hurricane-maria-exposes-a-common-problem-for-puerto-rico-homeowners-no-insurance-1505940660>

<sup>7</sup> <https://www.frontiersin.org/journals/water/articles/10.3389/frwa.2021.752307/full>

<sup>8</sup> Dundon, L. A., & Camp, J. S. (2021). Climate justice and home-buyout programs: renters as a forgotten population in managed retreat actions. *Journal of Environmental Studies and Sciences*, 11(3), 420-433.

Table 3: Results of Approach 2 – FR Method for MID Determination inclusive of all owners and renters

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 2: Total FR Determined Unmet Needs
Adjuntas	\$1,346,060	\$533,504	\$53,451	\$1,431,822	<b>\$3,364,837</b>
Aguada	\$300,682	\$745,152	\$181,441	\$379,517	<b>\$1,606,792</b>
Aguadilla	\$569,763	\$1,480,768	\$308,014	\$24,805	<b>\$2,383,350</b>
Aguas Buenas	\$0	\$404,800	\$145,658	\$25,092	\$575,550
Aibonito	\$0	\$1,021,056	\$182,503	\$569,561	<b>\$1,773,120</b>
Añasco	\$2,852,303	\$1,342,336	\$34,622	\$286,242	<b>\$4,515,503</b>
Arecibo	\$2,887,200	\$5,470,400	\$65,981	\$69,810	<b>\$8,493,391</b>
Arroyo	\$0	\$524,352	\$216,975	\$0	\$741,327
Barceloneta	\$579,749	\$386,304	\$226,917	\$2,647	<b>\$1,195,617</b>
Barranquitas	\$0	\$1,600,320	\$406,484	\$1,913	<b>\$2,008,717</b>
Bayamón	\$0	\$1,388,672	\$833,001	\$36,792	<b>\$2,258,465</b>
Cabo Rojo	\$1,715,755	\$2,344,896	\$688,930	\$333,082	<b>\$5,082,662</b>
Caguas	-\$1,100	\$2,841,792	\$706,072	\$562,416	<b>\$4,109,180</b>
Camuy	\$45,881	\$147,200	\$120,894	\$49,097	\$363,072
Canovanas	\$0	\$2,252,800	\$272,929	\$365,913	<b>\$2,891,642</b>
Carolina	\$0	\$1,278,464	\$1,331,929	\$0	<b>\$2,610,393</b>
Cataño	\$1,417,266	\$986,215	\$313,124	\$8,015	<b>\$2,724,619</b>
Cayey	\$0	\$505,856	\$342,697	\$149,964	\$998,517
Ceiba	\$0	\$321,856	\$5,896	\$219,000	\$546,752
Ciales	\$264,771	\$73,600	\$28,886	\$13,348	\$380,605
Cidra	\$0	\$487,360	\$98,634	\$954,918	<b>\$1,540,912</b>
Coamo	\$0	\$662,208	\$611,187	\$1,934,602	<b>\$3,207,997</b>
Comerío	\$0	\$772,416	\$104,475	\$150,782	<b>\$1,027,673</b>
Corozal	\$0	\$515,200	\$126,792	\$101,346	\$743,338
Culebra	\$0	\$0	\$79,510	\$0	\$79,510
Dorado	\$3,594,555	\$1,741,957	\$81,064	\$0	<b>\$5,417,576</b>
Fajardo	\$0	\$386,304	\$228,484	\$81,689	\$696,477
Florida	\$0	\$73,600	\$31,666	\$0	\$105,266
Guanica	\$471,514	\$450,560	\$41,072	\$49,525	<b>\$1,012,671</b>
Guayama	\$0	\$1,554,176	\$494,907	\$12,235	<b>\$2,061,318</b>
Guayanilla	\$834,924	\$616,064	\$227,553	\$0	<b>\$1,678,541</b>
Guaynabo	\$0	\$156,352	\$432,068	\$355,180	\$943,600

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 2: Total FR Determined Unmet Needs
Gurabo	\$0	\$294,208	\$175,369	\$43,264	\$512,841
Hatillo	\$31,859	\$423,104	\$248,134	\$0	\$703,097
Hormigueros	\$4,827,528	\$2,629,184	\$46,733	\$533,417	<b>\$8,036,862</b>
Humacao	\$0	\$3,871,424	\$3,738,307	\$567,635	<b>\$8,177,366</b>
Isabela	\$297,084	\$910,656	\$128,923	\$5,083	<b>\$1,341,746</b>
Jayuya	\$1,172,143	\$441,408	\$60,704	\$3,623,490	<b>\$5,297,745</b>
Juana Díaz	\$0	\$1,664,576	\$440,240	\$16,962	<b>\$2,121,778</b>
Juncos	\$0	\$1,186,560	\$295,872	\$0	<b>\$1,482,432</b>
Lajas	\$1,496,977	\$1,167,872	\$235,753	\$14,757	<b>\$2,915,358</b>
Lares	\$285,023	\$202,304	\$85,215	\$144,380	\$716,922
Las Marías	\$134,803	\$0	\$14,151	\$302,885	\$451,840
Las Piedras	\$0	\$1,766,016	\$87,558	\$2,929,521	<b>\$4,783,095</b>
Loíza	\$0	\$607,104	\$38,517	\$0	\$645,621
Luquillo	\$0	\$184,000	\$103,879	\$0	\$287,879
Manatí	\$215,145	\$340,352	\$35,003	\$36,544	\$627,044
Maricao	\$162,636	\$119,552	\$69,142	\$0	\$351,330
Maunabo	\$0	\$275,904	\$150,825	\$13,944	\$440,673
Mayagüez	\$1,608,022	\$1,655,808	\$1,067,803	\$154,275	<b>\$4,485,908</b>
Moca	\$379,226	\$1,076,160	\$320,861	\$123,383	<b>\$1,899,630</b>
Morovis	\$362,766	\$229,952	\$53,190	\$0	\$645,908
Naguabo	\$0	\$340,352	\$80,753	\$47,290	\$468,395
Naranjito	\$0	\$873,472	\$128,164	\$0	<b>\$1,001,636</b>
Orocovis	\$0	\$1,121,920	\$88,724	\$285,800	<b>\$1,496,444</b>
Patillas	\$0	\$377,152	\$45,297	\$1,916,384	<b>\$2,338,833</b>
Peñuelas	\$427,376	\$606,912	\$157,950	\$0	<b>\$1,192,238</b>
Ponce	\$0	\$4,231,040	\$2,600,932	\$180,307	<b>\$7,012,279</b>
Quebradillas	\$141,771	\$156,352	\$22,042	\$9,039	\$329,204
Rincón	\$587,299	\$349,504	\$84,265	\$44,288	<b>\$1,065,357</b>
Río Grande	\$0	\$193,152	\$245,834	\$210,661	\$649,647
Sabana Grande	\$422,498	\$432,256	\$43,392	\$67,436	\$965,582
Salinas	\$36,800	\$7,842,944	\$193,078	\$0	<b>\$8,072,822</b>
San Germán	\$749,321	\$560,960	\$457,018	\$8,643	<b>\$1,775,941</b>
San Juan	\$0	\$5,086,592	\$1,407,987	\$0	<b>\$6,494,579</b>

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 2: Total FR Determined Unmet Needs
<b>San Lorenzo</b>	\$36,800	\$625,600	\$297,125	\$684,945	<b>\$1,644,470</b>
<b>San Sebastián</b>	\$157,844	\$156,352	\$229,888	\$118,988	\$663,072
<b>Santa Isabel</b>	\$0	\$2,115,328	\$322,133	\$0	<b>\$2,437,461</b>
<b>Toa Alta</b>	\$0	\$736,000	\$329,904	\$0	<b>\$1,065,904</b>
<b>Toa Baja</b>	\$2,234,651	\$13,591,596	\$389,859	\$0	<b>\$16,216,106</b>
<b>Trujillo Alto</b>	\$0	\$404,800	\$137,250	\$0	\$542,050
<b>Utuado</b>	\$950,228	\$1,030,016	\$209,560	\$1,551,591	<b>\$3,741,395</b>
<b>Vega Alta</b>	\$874,311	\$596,164	\$528,594	\$42,499	<b>\$2,041,568</b>
<b>Vega Baja</b>	\$2,644,074	\$2,359,617	\$325,061	\$4,442	<b>\$5,333,194</b>
<b>Vieques</b>	\$0	\$36,800	\$3,926	\$0	\$40,726
<b>Villalba</b>	\$0	\$413,952	\$56,003	\$0	\$469,955
<b>Yabucoa</b>	\$0	\$1,940,288	\$181,884	\$0	<b>\$2,122,172</b>
<b>Yauco</b>	\$110,400	\$1,029,824	\$219,160	\$651,194	<b>\$2,010,578</b>

### Approach 3 - Accounting for All Loss Categories

The Federal Register method to determine the HUD-identified MID area does not account for all loss levels but rather focuses only on damage major to severe damage categories. This exclusion of areas where low-moderate impacts are more prevalent than high impacts ignores underlying socio-economic conditions and exacerbated distress from previous disasters. Many areas where impact + distress (disaster survivors still in the process of recovering from Irma, Maria, and the recent earthquakes or those with underlying socio-economic conditions such as poverty or social vulnerability) combine to produce unmet needs requiring attention. For Puerto Rico, where poverty levels are high and a majority of places have extreme numbers of population with Low-Moderate incomes, even small levels of disaster impact can have dire consequences. Consequently, ascertaining a complete and comprehensive summary of impacts can provide a more holistic view of remaining unmet needs. When coupled with rampant poverty and high LMI, any place with higher needs should be considered MID across Puerto Rico. This Approach 3, by implementing the same approach as above (Approaches 1 and 2) while accounting for all FR-defined damage levels, provides a better

perspective on unmet needs and potential MID. Results indicate that only sixteen (16) municipalities do not have higher than the minimum unmet need (Naranjito's \$1,278,336) for municipalities in the HUD-identified MID area. When accounting for all losses, most of Puerto Rico should be classified as MID.

Table 4: Results of Approach 3 - FR Method for MID Determination inclusive of all owners and renters and damage levels

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 3: Total FR Determined Unmet Needs
Adjuntas	\$3,139,798	\$734,934	\$53,451	\$1,431,822	<b>\$5,360,005</b>
Aguada	\$4,879,274	\$1,038,568	\$181,441	\$379,517	<b>\$6,478,800</b>
Aguadilla	\$5,863,196	\$2,110,317	\$308,014	\$24,805	<b>\$8,306,332</b>
Aguas Buenas	\$5,833	\$695,592	\$145,658	\$25,092	\$872,175
Aibonito	\$4,166	\$1,323,029	\$182,503	\$569,561	<b>\$2,079,259</b>
Añasco	\$5,810,115	\$1,497,680	\$34,622	\$286,242	<b>\$7,628,660</b>
Arecibo	\$12,247,927	\$6,160,803	\$65,981	\$69,810	<b>\$18,544,521</b>
Arroyo	\$3,750	\$837,495	\$216,975	\$0	\$1,058,220
Barceloneta	\$3,305,187	\$648,497	\$226,917	\$2,647	<b>\$4,183,248</b>
Barranquitas	\$3,750	\$2,172,987	\$406,484	\$1,913	<b>\$2,585,134</b>
Bayamón	-\$7,068	\$2,194,158	\$833,001	\$36,792	<b>\$3,056,883</b>
Cabo Rojo	\$7,195,084	\$2,874,169	\$688,930	\$333,082	<b>\$11,091,264</b>
Caguas	\$18,116	\$4,327,655	\$706,072	\$562,416	<b>\$5,614,259</b>
Camuy	\$3,953,510	\$352,867	\$120,894	\$49,097	<b>\$4,476,368</b>
Canovanas	\$6,666	\$2,680,089	\$272,929	\$365,913	<b>\$3,325,598</b>
Carolina	\$9,583	\$2,894,877	\$1,331,929	\$0	<b>\$4,236,389</b>
Cataño	\$1,458,919	\$1,308,908	\$313,124	\$8,015	<b>\$3,088,965</b>
Cayey	\$6,717	\$841,425	\$342,697	\$149,964	<b>\$1,340,803</b>
Ceiba	\$1,667	\$465,933	\$5,896	\$219,000	\$692,495
Ciales	\$2,129,853	\$247,531	\$28,886	\$13,348	<b>\$2,419,618</b>
Cidra	\$5,000	\$888,359	\$98,634	\$954,918	<b>\$1,946,910</b>
Coamo	\$10,833	\$1,162,532	\$611,187	\$1,934,602	<b>\$3,719,153</b>
Comerío	\$5,416	\$969,797	\$104,475	\$150,782	\$1,230,470
Corozal	\$8,333	\$947,821	\$126,792	\$101,346	\$1,184,292
Culebra	\$0	\$2,961	\$79,510	\$0	\$82,471
Dorado	\$7,006,952	\$1,991,792	\$81,064	\$0	<b>\$9,079,808</b>

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 3: Total FR Determined Unmet Needs
Fajardo	\$2,083	\$690,270	\$228,484	\$81,689	\$1,002,526
Florida	\$1,420,568	\$144,392	\$31,666	\$0	<b>\$1,596,627</b>
Guanica	\$2,360,788	\$599,989	\$41,072	\$49,525	<b>\$3,051,373</b>
Guayama	\$5,755	\$2,179,901	\$494,907	\$12,235	<b>\$2,692,798</b>
Guayanilla	\$3,077,511	\$825,665	\$227,553	\$0	<b>\$4,130,729</b>
Guaynabo	\$11,300	\$634,245	\$432,068	\$355,180	<b>\$1,432,793</b>
Gurabo	\$5,000	\$657,021	\$175,369	\$43,264	\$880,654
Hatillo	\$4,111,403	\$707,006	\$248,134	\$0	<b>\$5,066,544</b>
Hormigueros	\$6,526,192	\$2,788,414	\$46,733	\$533,417	<b>\$9,894,756</b>
Humacao	\$7,083	\$4,448,477	\$3,738,307	\$567,635	<b>\$8,761,502</b>
Isabela	\$4,913,571	\$1,190,151	\$128,923	\$5,083	<b>\$6,237,728</b>
Jayuya	\$2,705,099	\$638,016	\$60,704	\$3,623,490	<b>\$7,027,309</b>
Juana Díaz	\$3,916	\$2,123,258	\$440,240	\$16,962	<b>\$2,584,376</b>
Juncos	\$5,416	\$1,957,755	\$295,872	\$0	<b>\$2,259,044</b>
Lajas	\$4,282,680	\$1,352,219	\$235,753	\$14,757	<b>\$5,885,409</b>
Lares	\$3,366,467	\$422,618	\$85,215	\$144,380	<b>\$4,018,680</b>
Las Marías	\$1,128,028	\$111,751	\$14,151	\$302,885	<b>\$1,556,815</b>
Las Piedras	\$3,333	\$2,292,626	\$87,558	\$2,929,521	<b>\$5,313,038</b>
Loíza	\$2,917	\$959,795	\$38,517	\$0	\$1,001,229
Luquillo	\$0	\$345,180	\$103,879	\$0	\$449,059
Manatí	\$4,315,827	\$665,693	\$35,003	\$36,544	<b>\$5,053,067</b>
Maricao	\$742,539	\$188,215	\$69,142	\$0	\$999,896
Maunabo	\$417	\$503,530	\$150,825	\$13,944	\$668,716
Mayagüez	\$7,826,456	\$2,945,521	\$1,067,803	\$154,275	<b>\$11,994,055</b>
Moca	\$4,715,269	\$1,281,631	\$320,861	\$123,383	<b>\$6,441,144</b>
Morovis	\$3,696,522	\$431,938	\$53,190	\$0	<b>\$4,181,650</b>
Naguabo	\$2,500	\$609,103	\$80,753	\$47,290	\$739,646
Naranjito	\$10,416	\$1,148,756	\$128,164	\$0	<b>\$1,287,336</b>
Orocovis	\$16,666	\$1,538,672	\$88,724	\$285,800	<b>\$1,929,862</b>
Patillas	\$1,250	\$598,854	\$45,297	\$1,916,384	<b>\$2,561,785</b>
Peñuelas	\$2,931,642	\$795,711	\$157,950	\$0	<b>\$3,885,303</b>
Ponce	\$30,841	\$6,235,596	\$2,600,932	\$180,307	<b>\$9,047,677</b>
Quebradillas	\$2,657,894	\$280,915	\$22,042	\$9,039	<b>\$2,969,890</b>
Rincón	\$2,156,190	\$487,160	\$84,265	\$44,288	<b>\$2,771,903</b>

Municipality	Repair Estimates for seriously damaged (Major-Low, Major-High, Severe) owner-occupied units without insurance	Repair estimates for seriously damaged rental units occupied by very low-income renters	Repair and content losses estimates for small businesses with serious damage denied by SBA	Estimated local cost-share for Public Assistance Categories C-G	Approach 3: Total FR Determined Unmet Needs
Río Grande	\$2,917	\$616,834	\$245,834	\$210,661	\$1,076,245
Sabana Grande	\$3,035,602	\$634,701	\$43,392	\$67,436	<b>\$3,781,131</b>
Salinas	\$35,573	\$8,359,695	\$193,078	\$0	<b>\$8,588,346</b>
San Germán	\$4,203,067	\$831,061	\$457,018	\$8,643	<b>\$5,499,789</b>
San Juan	\$19,612	\$11,039,990	\$1,407,987	\$0	<b>\$12,467,590</b>
San Lorenzo	\$42,633	\$1,083,496	\$297,125	\$684,945	<b>\$2,108,199</b>
San Sebastián	\$4,394,359	\$403,007	\$229,888	\$118,988	<b>\$5,146,242</b>
Santa Isabel	\$3,750	\$2,478,806	\$322,133	\$0	<b>\$2,804,689</b>
Toa Alta	\$6,497	\$1,051,185	\$329,904	\$0	<b>\$1,387,585</b>
Toa Baja	\$2,426,410	\$14,276,818	\$389,859	\$0	<b>\$17,093,087</b>
Trujillo Alto	\$2,500	\$1,290,031	\$137,250	\$0	<b>\$1,429,781</b>
Utuado	\$4,077,602	\$1,327,856	\$209,560	\$1,551,591	<b>\$7,166,609</b>
Vega Alta	\$4,445,513	\$782,876	\$528,594	\$42,499	<b>\$5,799,482</b>
Vega Baja	\$8,826,813	\$2,799,037	\$325,061	\$4,442	<b>\$11,955,353</b>
Vieques	\$417	\$93,709	\$3,926	\$0	\$98,052
Villalba	\$3,750	\$651,452	\$56,003	\$0	\$711,205
Yabucoa	\$4,247	\$2,315,951	\$181,884	\$0	<b>\$2,502,083</b>
Yauco	\$3,199,714	\$1,354,816	\$219,160	\$651,194	<b>\$5,424,883</b>

#### Approach 4 - Accounting for relative exposure and impacts

Although the FR method is replicable – given access to the right data<sup>9</sup> – departing from the FR methods provides an opportunity to standardize equally across all municipalities and use comparative assessment rather than the HUD monetary threshold levels (>\$10 million per county/municipality or >\$2 million per zip code) of unmet needs that are not suitable for all places – including Puerto Rico. For Approach 4, OPEN FEMA IA Data for Owners<sup>10</sup> was value-added in a variety of ways

<sup>9</sup> This assessment is built on a set of data that, although similar, is not the same as HUD used to create the initial list of MID counties.

<sup>10</sup> <https://www.fema.gov/openfema-data-page/housing-assistance-program-data-owners-v2>



described in Table 5, enabling direct comparison across municipalities on a variety of factors.

Table 5: Value-added variables used in Approach 4

Value-added Variable Name	Standardization technique	Rationale
<b>Owners with Damage</b>	$x = \text{Total Valid Registrants} - \text{Total Owners without Damage}$	Utilizing standardized value(s) such as per capita or per household enables direct comparisons between places that are not affected by HUD's monetary thresholds.
<b>Valid Registrants Per Capita</b>	$x = \text{Total Valid Registrants} / \text{Total Population}^{11}$	
<b>Valid Registrants per Household</b>	$x = \text{Total Valid Registrants} / \text{Total Households}^{12}$	
<b>Owner Damaged Homes Per Capita</b>	$x = \text{Total number of Owner Applicants with Damage} / \text{Total Population}$	
<b>Owner Average Damage</b>	$x = \text{Total damage (as verified by FEMA)} / \text{Total number of Owner Applicants with Damage}$	
<b>Owner Damage Per Capita</b>	$x = \text{Total damage (as verified by FEMA)} / \text{Total Population}$	

Enabling a direct comparison between each municipality in a standardized way provides an opportunity to understand where each municipality falls in terms of impacts. Under Approach 4, the minimum value of each value-added variable and several variables for all HUD-identified MID areas (n=23 municipalities) provided a standardized threshold from which each municipality could be appraised (Table 6). Comparing the HUD-identified MID area to all municipalities across a variety of different standardized indicators provides a different perspective on which places were impacted and in which ways. If a non-MID municipality exceeds the minimum standardized value (for HUD-identified MID areas) for any of the comparison variables it should be considered as a MID area itself.

Table 6: Variables used for standardized comparison in Approach 4

Variable used in Approach 4 Comparisons	Minimum values for HUD-identified MID municipalities used to identify which municipalities should be designated as MID
Applicants Per Capita	0.2206
Applicants per Household	0.5864
Owners with Damage	425
Owner Damaged Homes Per Capita	0.0139
Owner Damage	\$1,355,475
Owner Average Damage	\$1,625
Owner Damage Per Capita	\$25

<sup>11</sup> Source: <https://data.census.gov/table?q=population&tid=ACSDP1Y2021.DP05>

<sup>12</sup> Source: <https://data.census.gov/table?q=B11016&tid=ACSDT1Y2021.B11016>

Resulting comparisons are provided in both Table 7 and Table 8, with the former providing mainly whole (un-adjusted) values of impacts across Puerto Rico municipalities and the latter providing both standardized (value-added) values and a count of instances where each municipality exceeded the minimum values for the HUD-identified MID municipalities. Results show that every municipality, except Culebra, exceeded at least one of the seven different variables used to identify MID areas across Puerto Rico. Most municipalities (n=52) exceeded four (4) or more categories, 17 exceeding HUD-identified MID area minimum thresholds in only one to three categories (Table 9).

Table 7: Comparative Assessment of Owner Impacts by Fiona (DR4671) and Severe Storms/Flooding (DR4649)

Municipality	HUD-identified MID	Population 2021	Households 2021	Valid Owner Registrants	Owners with Damage	Total Damage to Owners
<b>Exceedance Value (Minimum FR MID Value)</b>					<b>&gt;= 425</b>	<b>&gt;= \$1,355,475</b>
Adjuntas	Non-MID	18,068	5,611	4,572	420	<b>\$1,358,255</b>
Aguada	Non-MID	38,307	12,995	10,794	<b>702</b>	\$996,406
Aguadilla	Non-MID	55,241	21,442	12,671	<b>768</b>	\$1,221,307
Aguas Buenas	Non-MID	24,567	8,917	6,039	<b>549</b>	<b>\$1,505,743</b>
Aibonito	Non-MID	24,565	8,764	6,217	<b>633</b>	\$1,071,196
Anasco	MID	25,859	8,883	7,262	<b>530</b>	<b>\$1,474,565</b>
Arecibo	MID	88,017	31,624	22,293	<b>1,225</b>	<b>\$2,297,157</b>
Arroyo	Non-MID	16,183	6,147	4,867	<b>511</b>	\$731,980
Barceloneta	Non-MID	22,836	7,847	6,465	<b>510</b>	\$753,573
Barranquitas	MID	28,982	8,863	7,314	<b>1,085</b>	<b>\$2,421,909</b>
Bayamon	Non-MID	185,939	66,689	37,396	<b>1,768</b>	<b>\$2,636,562</b>
Cabo Rojo	MID	47,403	16,722	13,256	<b>1,136</b>	<b>\$2,245,478</b>
Caguas	MID	128,182	48,226	28,278	<b>2,004</b>	<b>\$3,256,098</b>
Camuy	Non-MID	32,885	11,367	9,115	<b>503</b>	\$549,694
Canovanas	MID	42,811	14,612	11,631	<b>865</b>	<b>\$1,902,083</b>
Carolina	Non-MID	155,886	61,112	29,842	<b>1,253</b>	\$1,176,749
Catano	Non-MID	23,536	8,716	4,087	292	\$646,080
Cayey	Non-MID	42,134	16,022	10,235	<b>898</b>	<b>\$1,736,037</b>
Ceiba	Non-MID	11,463	4,123	2,554	216	\$255,582
Ciales	Non-MID	17,045	5,623	4,671	321	\$572,918
Cidra	Non-MID	40,125	13,447	10,655	<b>748</b>	\$1,341,822
Coamo	Non-MID	35,268	13,023	9,253	<b>1,141</b>	\$1,286,600
Comerio	Non-MID	18,990	5,274	4,847	391	\$750,920
Corozal	Non-MID	34,631	10,614	8,944	<b>528</b>	\$806,253
Culebra	Non-MID	-	489	188	9	\$10,906
Dorado	MID	36,030	11,807	8,428	<b>569</b>	<b>\$1,654,493</b>

Municipality	HUD-identified MID	Population 2021	Households 2021	Valid Owner Registrants	Owners with Damage	Total Damage to Owners
Fajardo	Non-MID	32,336	12,158	6,678	524	\$727,076
Florida	Non-MID	11,725	4,331	3,311	213	\$186,029
Guanica	Non-MID	14,297	5,518	4,529	476	\$1,191,676
Guayama	MID	37,388	14,127	9,496	1,068	\$2,818,931
Guayanilla	Non-MID	18,047	6,375	5,372	530	\$968,960
Guaynabo	Non-MID	90,014	31,429	16,705	679	\$736,870
Gurabo	Non-MID	41,237	14,486	10,454	736	\$1,195,784
Hatillo	Non-MID	38,739	13,634	9,622	489	\$581,206
Hormigueros	MID	15,726	6,272	4,185	425	\$1,756,484
Humacao	MID	51,398	17,749	14,140	1,308	\$2,215,653
Isabela	Non-MID	42,985	14,846	11,062	590	\$904,531
Jayuya	Non-MID	14,877	5,004	3,816	487	\$1,134,164
Juana Diaz	MID	46,704	15,287	12,472	1,383	\$2,827,204
Juncos	Non-MID	37,290	13,065	10,378	859	\$1,488,980
Lajas	MID	23,407	7,765	6,842	619	\$1,500,204
Lares	Non-MID	28,092	9,882	7,413	405	\$530,089
Las Marias	Non-MID	8,896	2,695	2,344	190	\$302,468
Las Piedras	MID	35,495	12,068	9,859	896	\$1,961,187
Loiza	Non-MID	24,216	8,727	5,768	728	\$1,012,968
Luquillo	Non-MID	17,917	6,803	3,999	336	\$591,238
Manati	Non-MID	39,693	14,500	9,702	641	\$797,809
Maricao	Non-MID	-	1,888	1,455	125	\$283,691
Maunabo	Non-MID	10,700	3,891	3,010	478	\$896,287
Mayaguez	Non-MID	74,146	29,241	15,470	1,343	\$2,698,222
Moca	Non-MID	37,532	13,315	10,300	595	\$848,657
Morovis	Non-MID	29,069	9,654	8,120	486	\$765,548
Naguabo	Non-MID	23,722	8,160	6,167	510	\$610,144
Naranjito	MID	29,200	8,302	7,736	585	\$1,355,475
Orocovis	MID	21,510	6,828	6,576	923	\$2,940,685
Patillas	Non-MID	16,231	5,869	4,982	609	\$1,691,545
Penuelas	Non-MID	20,625	6,756	5,956	576	\$1,284,052
Ponce	MID	139,245	52,008	34,770	3,719	\$8,906,492
Quebradillas	Non-MID	23,743	8,261	6,073	199	\$339,395
Rincon	Non-MID	15,097	5,704	3,943	374	\$665,813
Rio Grande	Non-MID	47,630	15,573	11,727	936	\$884,267
Sabana Grande	Non-MID	22,860	6,868	6,228	521	\$1,296,332
Salinas	MID	26,208	9,778	8,492	1,629	\$6,337,098
San German	Non-MID	32,031	11,475	8,325	511	\$1,041,467
San Juan	Non-MID	344,791	142,829	48,131	2,008	\$4,344,823
San Lorenzo	MID	37,822	13,571	10,025	876	\$2,159,307
San Sebastian	Non-MID	39,351	13,808	9,981	456	\$529,918
Santa Isabel	MID	20,530	7,258	6,025	958	\$2,154,064
Toa Alta	Non-MID	67,602	22,055	15,246	750	\$1,334,572

Municipality	HUD-identified MID	Population 2021	Households 2021	Valid Owner Registrants	Owners with Damage	Total Damage to Owners
Toa Baja	MID	76,248	28,002	18,351	<b>1,576</b>	<b>\$7,026,748</b>
Trujillo Alto	Non-MID	68,001	24,022	12,592	<b>575</b>	\$823,015
Utuado	Non-MID	28,585	10,111	7,857	<b>782</b>	<b>\$1,633,751</b>
Vega Alta	Non-MID	35,728	12,146	9,017	<b>576</b>	\$1,303,428
Vega Baja	MID	54,544	19,799	14,903	<b>1,108</b>	<b>\$1,853,119</b>
Vieques	Non-MID	8,317	2,374	1,453	76	\$95,540
Villalba	Non-MID	22,341	7,823	6,512	<b>775</b>	\$1,041,445
Yabucoa	MID	31,047	11,905	9,473	<b>1,366</b>	<b>\$3,590,681</b>
Yauco	MID	34,704	11,836	10,312	<b>809</b>	<b>\$1,663,754</b>
<b>Number of municipalities that exceeded minimum values for HUD-identified MID municipalities</b>					<b>64</b>	<b>32</b>

Table 8: Comparative Assessment of Standardized Owner Impacts by Fiona (DR4671) and Severe Storms/Flooding (DR4649)

Municipality	Valid Registrants Per Capita	Valid Registrants per Household	Owner Damaged Homes Per Capita	Owner Average Damage	Owner Damage Per Capita	Count of Instances where Min value for HUD-identified MID was exceeded
<b>Exceedance Value (Minimum FR MID Value)</b>	<b>&gt;= 0.2206</b>	<b>&gt;=0.5864</b>	<b>&gt;= 0.0139</b>	<b>&gt;= \$1,625</b>	<b>&gt;= \$25</b>	
Adjuntas	<b>0.2530</b>	<b>0.8148</b>	<b>0.0232</b>	<b>\$3,234</b>	<b>\$75</b>	6
Aguada	<b>0.2818</b>	<b>0.8306</b>	<b>0.0183</b>	\$1,419	<b>\$26</b>	5
Aguadilla	<b>0.2294</b>	<b>0.5909</b>	<b>0.0139</b>	\$1,590	\$22	4
Aguas Buenas	<b>0.2458</b>	<b>0.6772</b>	<b>0.0223</b>	<b>\$2,743</b>	<b>\$61</b>	7
Aibonito	<b>0.2531</b>	<b>0.7094</b>	<b>0.0258</b>	<b>\$1,692</b>	<b>\$44</b>	6
Anasco	<b>0.2808</b>	<b>0.8175</b>	<b>0.0205</b>	<b>\$2,782</b>	<b>\$57</b>	7
Arecibo	<b>0.2533</b>	<b>0.7049</b>	<b>0.0139</b>	<b>\$1,875</b>	<b>\$26</b>	7
Arroyo	<b>0.3007</b>	<b>0.7918</b>	<b>0.0316</b>	\$1,432	<b>\$45</b>	5
Barceloneta	<b>0.2831</b>	<b>0.8239</b>	<b>0.0223</b>	\$1,478	<b>\$33</b>	5
Barranquitas	<b>0.2524</b>	<b>0.8252</b>	<b>0.0374</b>	<b>\$2,232</b>	<b>\$84</b>	7
Bayamon	0.2011	0.5608	0.0095	\$1,491	\$14	2
Cabo Rojo	<b>0.2796</b>	<b>0.7927</b>	<b>0.0240</b>	<b>\$1,977</b>	<b>\$47</b>	7
Caguas	<b>0.2206</b>	<b>0.5864</b>	<b>0.0156</b>	<b>\$1,625</b>	<b>\$25</b>	7
Camuy	<b>0.2772</b>	<b>0.8019</b>	<b>0.0153</b>	\$1,093	\$17	4
Canovanas	<b>0.2717</b>	<b>0.7960</b>	<b>0.0202</b>	<b>\$2,199</b>	<b>\$44</b>	7
Carolina	0.1914	0.4883	0.0080	\$939	\$8	1
Catano	0.1736	0.4689	0.0124	<b>\$2,213</b>	<b>\$27</b>	2
Cayey	<b>0.2429</b>	<b>0.6388</b>	<b>0.0213</b>	<b>\$1,933</b>	<b>\$41</b>	7

Municipality	Valid Registrants Per Capita	Valid Registrants per Household	Owner Damaged Homes Per Capita	Owner Average Damage	Owner Damage Per Capita	Count of Instances where Min value for HUD-identified MID's was exceeded
Ceiba	0.2228	0.6195	0.0188	\$1,183	\$22	3
Ciales	0.2740	0.8307	0.0188	\$1,785	\$34	5
Cidra	0.2655	0.7924	0.0186	\$1,794	\$33	6
Coamo	0.2624	0.7105	0.0324	\$1,128	\$36	5
Comerio	0.2552	0.9190	0.0206	\$1,921	\$40	5
Corozal	0.2583	0.8427	0.0152	\$1,527	\$23	4
Culebra	0.0000	0.3845	0.0000	\$1,212	\$0	0
Dorado	0.2339	0.7138	0.0158	\$2,908	\$46	7
Fajardo	0.2065	0.5493	0.0162	\$1,388	\$22	2
Florida	0.2824	0.7645	0.0182	\$873	\$16	3
Guanica	0.3168	0.8208	0.0333	\$2,504	\$83	6
Guayama	0.2540	0.6722	0.0286	\$2,639	\$75	7
Guayanilla	0.2977	0.8427	0.0294	\$1,828	\$54	6
Guaynabo	0.1856	0.5315	0.0075	\$1,085	\$8	1
Gurabo	0.2535	0.7217	0.0178	\$1,625	\$29	6
Hatillo	0.2484	0.7057	0.0126	\$1,189	\$15	3
Hormigueros	0.2661	0.6673	0.0270	\$4,133	\$112	7
Humacao	0.2751	0.7967	0.0254	\$1,694	\$43	7
Isabela	0.2573	0.7451	0.0137	\$1,533	\$21	3
Jayuya	0.2565	0.7626	0.0327	\$2,329	\$76	6
Juana Diaz	0.2670	0.8159	0.0296	\$2,044	\$61	7
Juncos	0.2783	0.7943	0.0230	\$1,733	\$40	7
Lajas	0.2923	0.8811	0.0264	\$2,424	\$64	7
Lares	0.2639	0.7502	0.0144	\$1,309	\$19	3
Las Marias	0.2635	0.8698	0.0214	\$1,592	\$34	4
Las Piedras	0.2778	0.8170	0.0252	\$2,189	\$55	7
Loiza	0.2382	0.6609	0.0301	\$1,391	\$42	5
Luquillo	0.2232	0.5878	0.0188	\$1,760	\$33	5
Manati	0.2444	0.6691	0.0161	\$1,245	\$20	4
Maricao	0.0000	0.7707	0.0000	\$2,270	\$0	2
Maunabo	0.2813	0.7736	0.0447	\$1,875	\$84	6
Mayaguez	0.2086	0.5291	0.0181	\$2,009	\$36	5
Moca	0.2744	0.7736	0.0159	\$1,426	\$23	4
Morovis	0.2793	0.8411	0.0167	\$1,575	\$26	5
Naguabo	0.2600	0.7558	0.0215	\$1,196	\$26	5

Municipality	Valid Registrants Per Capita	Valid Registrants per Household	Owner Damaged Homes Per Capita	Owner Average Damage	Owner Damage Per Capita	Count of Instances where Min value for HUD-identified MID was exceeded
Naranjito	0.2649	0.9318	0.0200	\$2,317	\$46	7
Orocovis	0.3057	0.9631	0.0429	\$3,186	\$137	7
Patillas	0.3069	0.8489	0.0375	\$2,778	\$104	7
Penuelas	0.2888	0.8816	0.0279	\$2,229	\$62	6
Ponce	0.2497	0.6686	0.0267	\$2,395	\$64	7
Quebradillas	0.2558	0.7351	0.0084	\$1,706	\$14	3
Rincon	0.2612	0.6913	0.0248	\$1,780	\$44	5
Rio Grande	0.2462	0.7530	0.0197	\$945	\$19	4
Sabana Grande	0.2724	0.9068	0.0228	\$2,488	\$57	6
Salinas	0.3240	0.8685	0.0622	\$3,890	\$242	7
San German	0.2599	0.7255	0.0160	\$2,038	\$33	6
San Juan	0.1396	0.3370	0.0058	\$2,164	\$13	3
San Lorenzo	0.2651	0.7387	0.0232	\$2,465	\$57	7
San Sebastian	0.2536	0.7228	0.0116	\$1,162	\$13	3
Santa Isabel	0.2935	0.8301	0.0467	\$2,249	\$105	7
Toa Alta	0.2255	0.6913	0.0111	\$1,779	\$20	4
Toa Baja	0.2407	0.6553	0.0207	\$4,459	\$92	7
Trujillo Alto	0.1852	0.5242	0.0085	\$1,431	\$12	1
Utuado	0.2749	0.7771	0.0274	\$2,089	\$57	7
Vega Alta	0.2524	0.7424	0.0161	\$2,263	\$36	6
Vega Baja	0.2732	0.7527	0.0203	\$1,672	\$34	7
Vieques	0.1747	0.6120	0.0091	\$1,257	\$11	1
Villalba	0.2915	0.8324	0.0347	\$1,344	\$47	5
Yabucoa	0.3051	0.7957	0.0440	\$2,629	\$116	7
Yauco	0.2971	0.8712	0.0233	\$2,057	\$48	7
<b>Number of municipalities that exceeded minimum values for FR MIDs</b>	67	69	64	50	55	

Table 9: Municipality count of instances where MID minimum values were exceeded.

	0	1	2	3	4	5	6	7
<b>HUD-identified MID Municipalities</b>								23
<b>Municipalities not identified as MID by HUD</b>	1	4	4	8	8	13	12	4

Using this comparative approach makes it clear that **all of Puerto Rico's municipalities were deeply impacted by these recent disasters**. Coupled with underlying socio-economic conditions and a recent history of disasters that many are still reeling from – these areas should all be considered MID as they attempt to access scarce CDBG-DR funds to help long-term recovery.

### **Public Action Plan Extension Request**

As part of the requirements established in 88 FR 32046, the Grantee must submit an action plan and implementation plan to HUD within 120 days of the applicability date of the Allocation Announcement Notice (May 23, 2023).<sup>13</sup> Given the significant opportunity that PRDOH may have to provide disaster recovery assistance across the Island, PRDOH reiterates its request to HUD for the approval of a 120-day extension to submit the Public Action Plan and Implementation Plan.

Through this extension, PRDOH will be able to continue collecting quantifiable and verifiable data to further identify the best strategies to assess the unmet needs in Puerto Rico. PRDOH will also be coordinating with federal agencies, local governments, public housing authorities, private entities, and non-governmental organizations, among other stakeholders, to comprehend the damages caused to the housing, infrastructure, and economic sectors and evaluate the recommendations proposed for the best use and distribution of these CDBG-DR funds.

Citizen participation is an essential key to supporting the development of the proposed action plan, as PRDOH relies on the input provided by individuals and stakeholders to implement the most efficient and adequate activities and projects for the recovery and resiliency of the Island. An extension will also allow PRDOH to properly coordinate a public hearing and execute a 30-day public comment period to acquire the comments to improve the proposed strategies required to expedite the recovery and mitigation efforts.

As the Grantee of the CDBG-DR and CDBG-MIT funds, PRDOH is committed to implementing fundamental recovery and mitigation services for the enhancement and strengthening of housing, infrastructure, and economic sectors. We appreciate HUD's consideration of these requests and look forward to receiving its approval to achieve a more resilient and better future for the people of Puerto Rico. PRDOH remains

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<sup>13</sup> See 88 FR 32046, 32072.

available to clarify any questions you and your team have regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MDS', with a period at the end.

Marezia Díaz Sánchez, Esq.  
Disaster Recovery Deputy Secretary  
Puerto Rico Department of Housing



**From:** Carlos R. Olmedo Álvarez  
**To:** Mendez Castaneda, Michelle; Maretzie Diaz Sanchez  
**Cc:** Rivera-Carrion, Laura I; Felix Hernandez Caban; Alicia Del Mar Rivera Lopez; Frances Rivera-Torres  
**Subject:** RE: <External Message> Request for Expansion of the HUD-identified MID Area and Extension Request of the Action Plan Deadline – Puerto Rico CDBG-DR Allocation for the Recovery from Severe Storm/Flooding (DR-4649-PR) and Hurricane Fiona (DR-4671-PR)  
**Date:** Tuesday, December 5, 2023 4:16:24 PM  
**Attachments:** image002.png  
 image003.png  
 Outlook-cid\_image0.png

Greetings Michelle,

We acknowledge receipt of the approval for the MID Area expansion request of DR-4649-PR and DR-4671-PR made by PRDOH. We will include the additional twenty-five (25) municipalities listed on the previous email in the Action Plan draft. Moreover, as discussed between Coordinating Officer for Disaster Recovery Laura I. Rivera and Disaster Recovery Deputy Secretary for PRDOH Maretzie Díaz, in order to safeguard the effectiveness of the community participation process and encourage a broader, profound interaction with the citizens of Puerto Rico that does not overlap with the Christmas season, we formally request a time extension from the January 18th 2023 submission deadline to Friday, March 1st 2023. This will allow the 30 day comments period to commence after the holiday period.

Feel free to reach out with any comments or questions.

Regards,

**Lcdo. Carlos R. Olmedo-Álvarez, PPL**  
 Secretario Auxiliar | Planificación y Gerencia de Subvenciones  
 Oficina de Recuperación de Desastres  
[colmedo@vivienda.pr.gov](mailto:colmedo@vivienda.pr.gov) | 787-274-2527 Ext. 4292  
 Visítanos: [www.cdbg-dr.pr.gov](http://www.cdbg-dr.pr.gov)  
 Contáctanos: [info@cdbg@vivienda.pr.gov](mailto:info@cdbg@vivienda.pr.gov)



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**From:** Mendez Castaneda, Michelle <Michelle.MendezCastaneda@hud.gov>  
**Sent:** Friday, December 1, 2023 11:47 AM  
**To:** Maretzie Diaz Sanchez <Mdiaz@vivienda.pr.gov>  
**Cc:** Rivera-Carrion, Laura I <Laura.I.Rivera-Carrion@hud.gov>; Carlos R. Olmedo Álvarez <Colmedo@vivienda.pr.gov>; Felix Hernandez Caban <Fhernandez@vivienda.pr.gov>; Alicia Del Mar Rivera Lopez <Amrivera@vivienda.pr.gov>  
**Subject:** RE: <External Message> Request for Expansion of the HUD-identified MID Area and Extension Request of the Action Plan Deadline – Puerto Rico CDBG-DR Allocation for the Recovery from Severe Storm/Flooding (DR-4649-PR) and Hurricane Fiona (DR-4671-PR)

Good morning Maretzie. I hope you and your team are doing well. We've consulted the expansion request for DR-4649-PR and DR-4671-PR with HUD's Office of Policy Development and Research and with ODR's Policy team, and recommendation was for PRDOH to move forward with Approach #1 which would add twenty-five (25) municipalities to the originally HUD-identified Most Impacted and Distressed (MID) areas. This would increase the number of municipalities classified as MID to forty-eight (48). The municipalities added, as per PRDOH's request, are: Adjuntas, Aguada, Aguadilla, Aibonito, Barceloneta, Bayamón, Carolina, Cataño, Cidra, Coamo, Comerío, Guayanilla, Isabela, Jayuya, Juncos, Mayagüez, Moca, Patillas, Peñuelas, Rincón, San Germán, San Juan, Toa Alta, Utuado, and Vega Alta. The total municipalities identified as MID areas after the approval of the expansion extension are:

1. Adjuntas	2. Aguada	3. Aguadilla	4. Aibonito	5. Añasco	6. Arecibo	7. Barranquitas	8. Barceloneta	9. Bayamón	10. Cabo Rojo
11. Carolina	12. Cataño	13. Caguas	14. Canóvanas	15. Cidra	16. Coamo	17. Comerío	18. Dorado	19. Guayanilla	20. Guayama
21. Hormigueros	22. Humacao	23. Isabela	24. Jayuya	25. Juana Díaz	26. Juncos	27. Lajas	28. Las Piedras	29. Mayagüez	30. Moca
31. Naranjito	32. Orocovis	33. Patillas	34. Peñuelas	35. Ponce	36. Rincón	37. Salinas	38. San Germán	39. Santa Isabel	40. San Juan
41. San Lorenzo	42. Toa Alta	43. Toa Baja	44. Utuado	45. Vega Alta	46. Vega Baja	47. Yabucoa	48. Yauco		

This information allows PRDOH to move forward with the drafting of the Public Action Plan in DRGR and publication of said plan on PRDOH's website for comments. In addition, it's important that you remember to comply with the Citizen Participation Requirements outlined in Section III D in 88 FR 32046, 32073 (May 18, 2023). If you have any questions or would like to further discuss the content of this communication, please contact us anytime.

Regards,



**Mitchelle Méndez Castañeda, Esq., LLM**

Community Planning and Development Specialist, Caribbean Region  
Office of Disaster Recovery  
Office of Community Planning and Development  
US Department of Housing and Urban Development  
Tel. 787-274-5905 | 202-257-1851

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**From:** Maretzie Diaz Sanchez <[Mdiaz@vivienda.pr.gov](mailto:Mdiaz@vivienda.pr.gov)>

**Sent:** Monday, October 9, 2023 7:55 PM

**To:** Rivera-Carrion, Laura I <[Laura.I.Rivera-Carrion@hud.gov](mailto:Laura.I.Rivera-Carrion@hud.gov)>; Disaster\_Recovery <[DisasterRecovery@hud.gov](mailto:DisasterRecovery@hud.gov)>

**Cc:** Carlos R. Olmedo Álvarez <[Colmedo@vivienda.pr.gov](mailto:Colmedo@vivienda.pr.gov)>; Felix Hernandez Caban <[Fhernandez@vivienda.pr.gov](mailto:Fhernandez@vivienda.pr.gov)>; Alicia Del Mar Rivera Lopez <[Amrivera@vivienda.pr.gov](mailto:Amrivera@vivienda.pr.gov)>

**Subject:** <External Message> Request for Expansion of the HUD-identified MID Area and Extension Request of the Action Plan Deadline – Puerto Rico CDBG-DR Allocation for the Recovery from Severe Storm/Flooding (DR-4649-PR) and Hurricane Fiona (DR-4671-PR)

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Greetings Laura;

Attached please find correspondence regarding the above referenced matter. Should you have any questions, please feel free to contact me.

Regards,

**Maretzie Díaz Sánchez, Esq.**

Disaster Recovery Deputy Secretary  
Office of Disaster Recovery  
Puerto Rico Department of Housing  
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DEPARTAMENTO DE LA  
**VIVIENDA**



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