



DEPARTMENT OF
HOUSING



CDBG-MIT

Action Plan

Public Comments

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I. Introduction

Public comments related to the Community Development Block Grant – Mitigation (CDBG-MIT) Action Plan were received in both English and Spanish during the extended public comment period which initiated on September 21, 2020 and concluded after sixty (60) days on November 20, 2020.

As part of the development of this Action Plan, the Puerto Rico Department of Housing (PRDOH) held a total of five (5) public hearings required for citizen participation, three (3) of which aired during the public comment period. Because organizations and individuals were unable to attend the public hearings in person to present proposals due to the imposed COVID-19 restrictions, PRDOH launched the “Ponencias del Pueblo”, an innovative campaign to encourage citizens and entities to submit short videos to summarize their proposals that were aired at the last two (2) public hearings. The videos and executive summaries aired and read, respectively, during the public hearings are considered as official public comments.

For the benefit of the reader, we have summarized the written comments submitted in Spanish and English. The comments cited, in some instances, were rephrased as a result of the translation process and/or because of time constraints so that they could be aired during the public hearings. The personal identification information in the comments has been hidden to protect the privacy of the person submitting the comment. To obtain additional information, please refer to the text of the comments submitted.

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

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

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

II. Public Comments

001 Comment ID: 09/22/20_WP_I_Resident of Puerto Rico_Luis m. Pérez Cornelio(1)

Comment: *I believe that this action plan is good for families that do not have their own home yet, to have an opportunity to improve.**

PRDOH Response: Thank you for your comment.

002 Comment ID: 09/26/20_WP_I_Resident of Puerto Rico_Hector G. Pagan(1)

Comment: *I think they should use the funds to help all the projects that are necessary for Puerto Rico right now.**

PRDOH Response: Thank you for your comment. We will fund the greatest number of projects eligible as available funding allows.

003 Comment ID: 10/10/20_WP_I_Resident of Puerto Rico_Emanuel Rosado(1)

Comment: *Why do they put the comments section without it being able to be closed, what I want is to orient myself but the darn article does not allow one to read I already know because the money from the funds is lost, remove the darn article to leave comments if they are going to make an article that is to request the blessed funds, I left a photo of the garbage that does not allow me to read the information.**

Greetings Mr. Rosado,

We regret that you have experienced technical difficulties with our website. Thank you for your interest in reading the draft and for letting us know your situation so that we can continue to improve our page. Click here for the link that leads directly to the draft CDBG-MIT Action Plan.

PRDOH Response: As for how to access the draft from the mitigation page:

- When you open the website, the window appears announcing the public comment period with a link to the form. Do not press that window, please click anywhere outside the window box or on the X located at the top right of the window to close it.
- The main page has several buttons, press the one identified as "CDBG-MIT Action Plan".

We hope you can access the document and comment on it.

Comment:

International Medical Corps is a global humanitarian organization that is working to improve mental health, nutrition and health facility resiliency in Puerto Rico. Our organization believes that many critical issues were raised in the report, but felt there were gaps in programming and greater room for monitoring contracts to improve health equity and island resiliency. (1) There is need to include development training and capacity building for local NGO's. NGO's are a valuable economic sector and would greatly benefit from economic development activities similar to those available to startups, this includes incubators, angel funds and shared platforms for business services like HR and Legal. Programs on collaboration building can also support NGO's, such as through the establishment of collaboration clusters, not only for topic area but also business supports such as logistics and finance. (2) Suicide prevention and Mental Health are critical health issues in Puerto Rico. There is a link between disasters and mental health concerns and an assessment conducted by International Medical Corps identified an aggravation of existing Mental Health concerns after Hurricane Maria. All vendors receiving greater than \$100,000 in contracts, should be required to put in place mental health assistance programs and train managerial staff on assessing and referring workers to mental health support. These types of programs save lives and were successful in Superstorm Sandy. The field of construction has high rates of suicide nationally. Every effort should be taken to insure that Puerto Rican workers are safe not only physically but also emotionally and psychologically. (3) Finally, our organization is very aware of the supply chain barriers to purchasing locally. However, building local supply chains are essential for resilience to future disasters. CDBG-DR and MIT funding are an excellent opportunity to push for improved policy and grow procurement and logistics capacity of local vendors. International Medical Corps recommends putting in place monitoring systems for private and public companies receiving contracts so that they explore local purchasing options. This could include requirements for all major contractors that they invite minority-owned and underutilized businesses to bid on quotes or mandatory reporting on the percentage of supplies sourced locally. Similar consideration should be made for sub-contractors who are providing workforce. Thank you for the opportunity to provide comment and we are always available to discuss these themes further.

Thank you for your comment.

PRDOH
Response:

We encourage you to read the Planning and Capacity Building Program in the CDBG-MIT Action Plan which has been designed to strengthen the capacity of state agencies, municipalities, NGOs and existing regional partnerships by assisting in the formation and/or strengthening and formalizing of existing, regional consortia to conduct mitigation enhancing activities.

Please refer to Procurement Section at: <https://cdbg-dr.pr.gov/en/procurement-and-nofa/> that includes HUD-approved procurement policies and Section 3.

It is important to highlight that the DR and MIT Programs have an obligation to promote minority- and women-owned business enterprises (MWBE). In fact, these are given an additional score in the selection process for goods and services proposals for CDBG-DR funds. All the information contained there will also apply to CDBG-MIT.

005 Comment ID: 10/12/20_WP_I_Resident of Puerto Rico_Ricardo Ouslan(1)

Comment: *We are 30 workers waiting to work with the Solar Taxis!**

PRDOH Response: Comment noted.

006 Comment ID: 10/14/20_E_I_Resident of Puerto Rico_Edwin Garcia(1)

Comment: *Greetings! On page 283, the reference is not made to the consortia being eligible, even though they are discussed on the previous pages. If they are eligible, would the consortia managing WIOA funds be eligible? Let me know. Thank you!**

PRDOH Response: The Action Plan draft sets the framework for proposed funding programs. More specific information will be provided in program guidelines, which will be written and made available after HUD approves the Action Plan. Keeping that in mind, there are a variety of ways by which a consortium may be legally formed. All of the listed entities, including public entities and NGOs, may serve as the lead entity for a consortium, or a consortium may be formed including any of the eligible entities. All applicants must demonstrate community support for proposed projects. This may include: documentation of consultation with the local municipality (ies) in which the project area and persons of benefit reside, letter(s) of support from community organizations or leaders representing the project area and persons of benefit, or through instruments such as formalized consortia or executed memoranda of agreement (MOA). All applicants will be required to submit an operations and maintenance plan in order to qualify.

007 Comment ID: 10/22/20_E_SGA_Junta de Planificacion_Maria del C. Gordillo Perez(1)

Good afternoon:

Comment: *Attached are the Comments of the CDBG-MIT Action Plan, for the corresponding action.*

*Thank you,**

President María del C. Gordillo Pérez,

PRDOH
Response:

Thank you and the Puerto Rico Planning Board for your comments. The language proposed for the Housing Mitigation Program shall be incorporated into the Action Plan draft with some modification. The suggestion to incorporate a Substantial Damage Determination Notice into the eligibility criteria for the Housing Mitigation Program will be taken into consideration during the future development of program guidelines.

008

Comment ID:

10/23/20_WP_NGO_Fideicomiso de la Tierra del Caño Martín Peña_Lcda. Sarah Delgado Brayfield(1)

Comment:

*The proposal was submitted for the Caño Martín Peña Land Trust**

PRDOH
Response:

Thank you for the submission of your proposal. The executive summary was read live during the Ponencias del Pueblo Segment of the public hearing held on October 28, 2020. All projects, including Covered Projects, must be reviewed for eligibility under program requirements, which shall not take place until after HUD's approval of the CDBG-MIT Action Plan and the release of CDBG-MIT funds. The full evaluation process for Covered Projects will be finalized and communicated to all eligible funding recipients through the publication of Program Guidelines for all applicable Infrastructure and multi-sector programs.

009

Comment ID:

10/28/20_WP_NGO_Fideicomiso de la Tierra del Cano Martin Pena_Alexia Suarez(1)

Comment:

*Good morning, someone from your agency wrote to us yesterday requesting that we shorten our presentation filed on October 21 to CDBG-MIT to a new one with a maximum of 3 minutes. Yesterday, as requested, we sent a 3-minute version presentation. We have not received confirmation that our presentation was replaced with the new-shorter one sent yesterday. Please confirm replacement and that all is in order for today's Public Views.**

*Greetings, as requested yesterday we re-sent a shorter version (3 minutes) of our Presentation for today's CDBG-MIT Public Hearings. I include a copy here of the presentation of the Cano Martin Pena Land Trust (3 minutes). I have spoken by phone through the phone number on the digital page and I have written, but I still do not have confirmation that the short version requested will be used for the presentation. Please confirm that you have access to a short version of our presentation, and everything is in order. You can call me at 939-349-1500 to confirm or write. Thank you**

PRDOH
Response:

We confirm receipt of your Proposal and Executive Summary. The Ponencias del Pueblo were transmitted during the CDBG-MIT public hearing that was held on October 28, 2020, and the documents delivered are part of the record for the hearing.

010 Comment ID: 10/29/20_E_FGA_U.S. Department of Transportation_Carlos Figueroa(1)

I reviewed several sections of PRDOH's Draft CDBG-MIT Action Plan. Attached are some comments for consideration by the PRDOH CDBG-MIT Group.

Comment:

Please contact me with any questions.

Regards.

Carlos F. Figueroa, P.E., PMP

Transportation Recovery Representative, Puerto Rico and U.S. Virgin Islands

U.S. Department of Transportation

Office of the Secretary Office of Intelligence, Security, and Emergency Response

Thank you for the clarification; edits have been incorporated.

PRDOH
Response:

The Federal Register requires that activities funded with the CDBG–MIT grant result in measurable and verifiable reductions in the risk of loss of life and property from future disasters and yield community development benefits. Each project will be evaluated according to its mitigation merit and cost feasibility. PRDOH recommends that the needs of all citizens in urban and rural locations, and in particular vulnerable populations, be taken into consideration and that these be part of the mitigation plans of regional consortia which should include municipalities as a partner. The CDBG-DR planning programs Whole Community Resilience Planning (WCRP) and Municipal Recovery Planning (MRP) programs provide access to communities to participate in the planning processes for initiatives, programs and projects.

011 Comment ID: 10/30/20_E_MGA_Municipality of Caguas_Zaid Diaz Isaac on Behalf of the Mayor of Caguas(1)

Comment:

*Listed possible projects for the CDBG-MIT Funds. The MIT Team reviewed the projects and they submitted them in the Proposed projects log. See document attached.**

Hon. William Miranda Torres,

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the mitigation program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

012 Comment ID: 10/31/20_WP_I_Resident of Puerto Rico_Martha j sanchez delgado(1)

Comment: *Please I would like to know more about your assistance, and I need you to please help me move out of where I live as soon as possible and I have called several of the institutions that you have on the list**

Greetings Mrs. Sánchez,

Regarding your housing situation, the CDBG-MIT Housing Mitigation Program will offer relocation for households currently in high-risk flood and landslide areas in order to reduce the risk of loss of life and property from future disasters. These funds, however, will not be available until after HUD's approval of the CDBG-MIT Action Plan and the release of CDBG-MIT funds, which is not expected until spring of 2021 at the earliest.

PRDOH
Response:

Nevertheless, based on the information provided, we believe that this question is related to the CDBG-DR Homebuyer Assistance Program. In addition, under CDBG-DR there is a Housing Counseling Program that provides guidance on housing and financial options such as: financial literacy, home buyer counseling, credit repair counseling, mitigate default/foreclosure proceedings, etc. For more information, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324, email infoCDBG@vivienda.pr.gov or find detailed information about CDBG-DR housing programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

013 Comment ID: 11/02/20_WP_NGO_EcoExploratorio, Inc._Ada Monzon(1)

Comment: *EcoExploratorio, Inc. is committed to reducing the impact of current and future disasters in Puerto Rico. It is proposing building the Resilience Institute of Puerto Rico at the Puerto Rico Convention District. Please, read the following document in attachment with all the details.*

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. We acknowledge receipt of the EcoExploratorio Resilience Institute of Puerto Rico proposal. It has become part of the public comment record. Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

014 Comment ID: 11/05/20_WP_I_Resident of Puerto Rico_Carmen D. Cintrón Martínez(1)

Comment: *I have not been able to complete the survey. When I click on the link, nothing happens. I can hear the instructional video, but I can't see it.**

Greetings Mrs. Cintron,

Thank you for your interest in completing the CDBG-MIT Citizen Survey.

PRDOH Response: We confirm receipt of your submitted comment through the Public Comments form on technical difficulties by accessing the survey. We encourage you to use the following browsers: Google Chrome or Safari. We do not recommend the Internet Explorer browser. If you are still having trouble accessing the survey or video tutorial, please contact us again.

Thank you,
CDBG-MIT Program

015 Comment ID: 11/05/20_WP_I_Luis Alberto Lopez_Evelyn andino Maldonado(1)

Comment: *I don't understand much of this**

PRDOH Response: The United States Department of Housing and Urban Development (HUD) allocated Puerto Rico \$ 8.285 billion in funding from the Community Development Mitigation Block Grant (CDBG-MIT). The funding allocation for CDBG-MIT is different than the Community Development Block Grant for Disaster Recovery (CDBG-DR). Mitigation, according to HUD, includes activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters. The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used.

016 Comment ID: 11/05/20_WP_NGO_Community Development Venture Capital Alliance_Kerwin Tesdell(1)

Comment: *Please see letter uploaded with our comments. Thank you.*

PRDOH Response: Comment noted. PRDOH will take this under advisement when determining how to distribute funding for the Community Energy and Water Resilience Installations (CEWRI) Program and the Economic Development Investment Portfolio for Growth - Lifeline Mitigation (EDIPG) Program.

017 Comment ID: 11/05/20_WP_SGA_Compañía para el Desarrollo Integral de la Península de Cantera_Alejandra Ramos Carmenatty(1)

Comment: *Greetings. A memorandum with comments is attached for your consideration.**

PRDOH
Response:

Thank you for the submission of your proposal. The executive summary was read live during the Ponencias del Pueblo Segment of the public hearing held on October 28, 2020. The Ponencias del Pueblo were transmitted during the CDBG-MIT public hearing and the documents delivered are part of the record for the hearing.

018

Comment ID: 11/05/20_WP_NGO_INSTITUTO PRE-VOCACIONAL E INDUSTRIAL DE PR INC._Nilsa Lopez Rivera(1)

Comment:

*We hope to submit a proposal to be considered in this great initiative. We will be waiting for any communication in this regard.**

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

019

Comment ID: 11/05/20_WP_NGO_Corporacion Desarrollo Economico, Vivienda y Salud (CODEVYS)_Nilsa Lopez Rivera(1)

Comment:

*This great initiative is necessary for the recovery of Puerto Rico and it will be of great use given the resilience our Country needs.**

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

020

Comment ID: 11/05/20_WP_NGO_Colegio Educativo Tecnologico Industrial (CETI College) Inc._Nilsa Lopez Rivera(1)

Comment:

*The Mitigation Plan is an ideal alternative for the recovery of Puerto Rico and offers viable alternatives to improve the quality of life of citizens.**

PRDOH
Response:

Thank you for your comment. It has become part of the public comment record. We appreciate the support of Colegio Educativo Tecnológico Industria (CETI College) in this monumental effort. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

021

Comment ID: 11/05/20_WP_NGO_Iniciativa Comunitaria de Arecibo Inc._Nilsa Lopez Rivera(1)

Comment: *Initiative that unites for the good of a community in the reestablishment of Puerto Rico. We will work hand in hand to comply with the Mitigation Plan, as collaborators of it.**

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. We appreciate the support of Iniciativa Comunitaria de Arecibo in this monumental effort. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

022

Comment ID: 11/06/20_WP_PFP_Furia_Johanna Rosa Rivera(1)

Comment: *Help my community**

PRDOH
Response:

Thank you for your comment. CDBG-MIT will support activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters. The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used. Nevertheless, if you are in need of immediate assistance, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324 for assistance with currently available CDBG-DR programs, or email infoCDBG@vivienda.pr.gov. You can find more information about CDBG-DR programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

023

Comment ID: 11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)

October 5, 2020

Hon. Luis C. Fernández Trinchet
Secretary
Puerto Rico Department of Housing
San Juan Puerto Rico

Attorney Carlos R. Olmedo
CDBG-MIT Program

Dear Mr. Secretary:

Best regards.

As you know, during the past months, the Municipal Government of Guánica, together with the Department of Housing, have been working tirelessly to take affirmative steps in the recovery process from the known natural disasters suffered in recent times.

Comment:

As part of that effort, he has simultaneously been designing a creative and aggressive work plan to make our communities more resilient and put us in the right position to participate in the competitive funds of the CDBG Mitigation program, as well as any other applicable.

In compliance with the foregoing, we submit this proposal for your consideration, so that it can be inserted into the Agency's Action Plan of the aforementioned CDBG-MIT program, in order to be able to channel the ambitious and necessary goals of our Administration. in favor of our communities.

Waiting for your customary collaboration in this regard, I remain up to you.

Respectfully,

Jose Rodriguez
Planning Advisor
Guánica Municipality*

Hon. Santos Seda Nazario,

PRDOH
Response:

Thank you for your submission. We acknowledge receipt of your projects. It has become part of the public comment record. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

024 Comment ID: 11/06/20_WP_I_Resident of Puerto Rico_YANDEILY MATOS CRUZ(1)

Comment: *A study of the structures with all their permits and ensure that they are safe for citizens. Use both engineering improvements to secure homes. Carry out the simplest processes for citizens.**

PRDOH Response: Thank you for your comment. CDBG-MIT will support activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters. The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used.
If you are interested in learning more about CDBG-DR and MIT programs, you can access the PRDOH website at the following link: <https://cdbg-dr.pr.gov>.

025 Comment ID: 11/06/20_E_I_Comunidad de Villa Batata Loíza,PR._Maria Concepcion(1)

Comment: *I am saddened by training on CDBG / MIT Funds. For those who are doing this type of demographic density. If our resident does not have property title. If in the past we have built on the roofs of our parents. Our homes do not have a value, like other residents in urbanization or other types of very expensive housing, the aid would be for this and not for we suffer it in each atmospheric event. When you yourself know and recognize where the problems are of rivers, streams that overflow and we drown. Stop hindering the poor. Please let us work to have a flood free community, with low-income families, with happy homes. Another request for more time to submit. God help us.**

PRDOH Response: The Housing Mitigation Program will offer eligible, individual flood-and-landslide threatened homeowners with the option to opt in for voluntary relocation or investigate the feasibility of elevation of their home above the FEMA base flood elevation. Homeowners seeking elevation will eventually need to provide proof of ownership. Interested homeowners are encouraged to consult with the CDBG-DR Title Clearance Program, designed to provide assistance for those citizens that cannot provide proof of ownership and are eligible for other assistance.

The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used.
Nevertheless, if you are in need of immediate assistance, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324 for assistance with currently available CDBG-DR programs, or email infoCDBG@vivienda.pr.gov. You can find more information about CDBG-DR programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>

026 Comment ID: 11/06/20_WP_FGA_Banco Popular_Carmen O. Zavala Lebron(1)

Comment: *I would like you to help me with the mortgage that I have in arrears and I asked helps the bank where modifications are made. They helped me but it's like going back to first grade. Doing 30 more years. And the payment was 847.00 and now it will be 545 We have already paid 16 years and we have 14 years left. For this reason I ask for your help to be able to continue paying.*

Sincerely,

*Carmen or. Zavala lebron**

PRDOH Response: Mortgage assistance is not something that is offered through the CDBG-MIT Program. The Housing Mitigation Program will offer eligible, individual flood-and-landslide threatened homeowners with the option to opt in for voluntary relocation or investigate the feasibility of elevation of their home above the FEMA base flood elevation. Homeowners seeking elevation will need to eventually provide proof of ownership. Interested homeowners are encouraged to consult with the CDBG-DR Title Clearance Program, designed to provide assistance for those citizens that cannot provide proof of ownership and are eligible for other assistance.

The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used.

Nevertheless, under CDBG-DR there is a Housing Counseling Program that provides guidance on housing and financial options such as: financial literacy, home buyer counseling, credit repair counseling, mitigate default/foreclosure proceedings, etc. For more information, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324, email infoCDBG@vivienda.pr.gov or find detailed information about CDBG-DR housing programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

027 Comment ID: 11/10/20_WP_I_alexandra torres walker_alexandra torres walker(1)

Comment: *I would like to buy a house for the first time**

PRDOH Response: Homebuyer assistance is not something that is offered through the PRDOH CDBG-MIT Program. It is, however, an available option through the CDBG-DR Homebuyer Assistance Program.

Please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324 for assistance with currently available CDBG-DR programs, or email infoCDBG@vivienda.pr.gov. You can find more information about CDBG-DR programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

028 Comment ID: 11/11/20_WP_PFP_HAPPY FARMS_TOMAS III ALEMAN PEREZ(1)

Comment: *To fill the incentive, how do we do it?**

PRDOH
Response:

The CDBG-MIT Economic Development Investment Portfolio for Growth – Lifeline Mitigation Program will target funding for privately owned lifeline infrastructure to support Risk-Based Mitigation Needs. The launch of this program shall also take into account the changing economic landscape, as benefits of economic recovery efforts tied to the hurricanes are realized. These funds, however, will not be available until after HUD's approval of the CDBG-MIT Action Plan and the release of CDBG-MIT funds, which is not expected until spring of 2021 at the earliest.

Based on the information provided, we believe that this question is related to the CDBG-DR Re-Grow PR Urban-Rural Agriculture Program and other currently available CDBG-DR Economy programs, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324, email infoCDBG@vivienda.pr.gov or visit the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

029 Comment ID: 11/12/20_WP_I_Resident of Puerto Rico_Blanccamar León Ramos(1)

Comment: *Interested in the funds, please, my phone number is 787-232-6401**

PRDOH
Response:

The United States Department of Housing and Urban Development (HUD) allocated Puerto Rico \$ 8.285 billion in funds from the Mitigation Community Development Block Grant (CDBG-MIT). The Puerto Rico Department of Housing (PRDOH) will administer these funds. The funding allocation for CDBG-MIT is different from that of the Community Development Block Grant for Disaster Recovery (CDBG-DR).

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

The first step in accessing these funds is to develop and submit to HUD the CDBG-MIT Action Plan that describes how the funds will be used. Once the Plan is approved, PRDOH will announce the programs and the program guidelines availability.

030 Comment ID: 11/12/20_WP_I_upr Carolina_Edward Reyes(1)

Comment: *Interested**

The United States Department of Housing and Urban Development (HUD) allocated Puerto Rico \$ 8.285 billion in funds from the Mitigation Community Development Block Grant (CDBG-MIT). The Puerto Rico Department of Housing (PRDOH) will administer these funds. The funding allocation for CDBG-MIT is different from that of the Community Development Block Grant for Disaster Recovery (CDBG-DR).

PRDOH
Response:

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

The first step in accessing these funds is to develop and submit to HUD the CDBG-MIT Action Plan that describes how the funds will be used. Once the Plan is approved, PRDOH will announce the programs and the program guidelines availability.

031 | Comment ID: 11/14/20_WP_I_Resident of Puerto Rico_Rafael González Marrero(1)

Comment: *Very good for everyone that wishes to have a home very good help.**

PRDOH
Response:

Thank you for your comment. The Housing Mitigation Program will offer eligible, individual flood-and-landslide threatened homeowners with the option to opt in for voluntary relocation or investigate the feasibility of elevation of their home above the FEMA base flood elevation. Homeowners seeking elevation will eventually need to provide proof of ownership. Interested homeowners are encouraged to consult with the CDBG-DR Title Clearance Program, designed to provide assistance for those citizens that cannot provide proof of ownership and are eligible for other assistance.

The first step for Puerto Rico to access these funds is to develop and deliver to HUD the CDBG-MIT Action Plan that describes how the funds will be used.

Nevertheless, if you are in need of immediate assistance, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324 for assistance with currently available CDBG-DR programs, or email infoCDBG@vivienda.pr.gov. You can find more information about CDBG-DR programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>

032 | Comment ID: 11/14/20_WP_NGO_COALICIÓN COMUNITARIA LOÍZA AHORA_Eddies A. Rivera(1)

Comment: *See Attached word document titled: "MITIGATION PROPOSAL OF THE COALICIÓN COMUNITARIA LOÍZA AHORA (LOÍZA COMMUNITY COALITION) PRESENTED FOR PR MITIGATION PLAN AND CDBG-MIT MITIGATION COMMUNITY DEVELOPMENT BLOCK GRANT FOR MITIGATION PROGRAM."**

PRDOH
Response:

Thank you for your comments. We commend the community's efforts to utilize and leverage all available Federal Funding sources for mitigating future impacts to the community. Please note that by law, (codified in the HCDA as a note to 105(a)), the maximum amount of CDBG-MIT funds that may be contributed to a USACE project is \$250,000. Please also note that the Appropriations Act (Division B, Subdivision 1 of the Bipartisan Budget Act of 2018, Pub. L. 115-123, approved February 9, 2018) prohibits the use of CDBG-MIT funds for any activity reimbursable by, or for which funds are also made available by FEMA or USACE.

Please be advised that all projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

033 | Comment ID: 11/14/20_WP_NGO_COALICIÓN COMUNITARIA LOÍZA AHORA_Eddies A. Rivera(2)

Comment:

*ATTENTION THE "LOÍZA NOW COALITION" PRESENTS ITS COMMUNITY MITIGATION PROPOSAL, IT IS BASED ON THE TRUE PRIORITIES OF MITIGATION FOR THE WHOLE MUNICIPAL TERRITORY OF LOÍZA. IT IS URGENT AND IMPORTANT ALL THE PROJECTS AND SUGGESTIONS IN THE SAME AS THEY COME FROM THE FEELING AND SITUATIONS EXPERIENCED BY THE RESIDENTS OF THIS IMPORTANT PUERTO RICAN MUNICIPALITY.**

PRDOH
Response:

Thank you for your comments. We commend the community's efforts to utilize and leverage all available Federal Funding sources for mitigating future impacts to the community. Please note that by law, (codified in the HCDA as a note to 105(a)), the maximum amount of CDBG-MIT funds that may be contributed to a USACE project is \$250,000. Please also note that the Appropriations Act (Division B, Subdivision 1 of the Bipartisan Budget Act of 2018, Pub. L. 115-123, approved February 9, 2018) prohibits the use of CDBG-MIT funds for any activity reimbursable by, or for which funds are also made available by FEMA or USACE.

Please be advised that all projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

034 | Comment ID: 11/15/20_WP_I_Policía de puerto Rico_Indhira salinas(1)

Comment: *How can I request information of empirical for the purchase of the home?**

Homebuyer assistance is not something that is offered through the PRDOH CDBG-MIT Program. It is, however, an available option through the CDBG-DR Homebuyer Assistance Program.

PRDOH

Response:

Please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324 for assistance with currently available CDBG-DR programs, or email infoCDBG@vivienda.pr.gov. You can find more information about CDBG-DR programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

035	Comment ID:	11/16/20_E_NGO_Ayuda Legal Puerto Rico_Ariadna Michelle Godreau Aubert(1)
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*We accompany the reference document
We appreciate acknowledgment of receipt*

Comment:

-
*Lcda. Ariadna Michelle Godreau Aubert
Founder and Executive Director / Founder and Executive Director
Ayuda Legal Puerto Rico
www.ayudalegalpuertorico.org*
Real and effective participation,*

The official Spanish translation to the announcements of the CDBG-MIT funds is found in the following link: <https://cdbg-dr.pr.gov/download/registro-federal/?ind=1605823078367&filename=85%20FR%204676%20ESP.pdf&wpdmdl=15139&refresh=5fb97a4440b831605990980>

PRDOH has the interest of promoting the confidence of the PR people in the processes associated with the distribution of CDBG-MIT funds. The purpose of making public views on television responds to our commitment to provide access to all citizens of an additional platform for participation that in the past had not been used for this type of purpose.

PRDOH

Response:

Terms Will be extended if we find the necessity. But this moment the public comments period is sixty (60) days.

Technical issues don't permit the monitoring of live public participation during Public Hearings transmission, but we will take into consideration your suggestion for future TV public hearings.

We understand that your concerns regarding the technical complexities of the MIT-Action Plan. PRDOH and their officials are aware of this situation and we are trying to develop an effective tool to make understandable the Action Plan.

Projects for the action plan were added to the Action Plan in the Proposed Project Log template to federal, state, municipal, and NGO stakeholders to request a baseline understanding of mitigation project needs. HUD has created a new standard for the evaluation of larger-scale infrastructure projects by introducing the concept of Covered Projects. A Covered Project is defined as an infrastructure project having a total project cost of \$50 million or more, with at least \$25 million of CDBG funds (regardless of source (CDBG-DR, CDBG-National

Disaster Resilience (NDR), CDBG-MIT, or CDBG)). Infrastructure projects that meet the definition of a Covered Project must be included in the action plan or a substantial action plan amendment. Also we have programs designed for community like the Community and Water Resilience Installation Program, Portfolio for Growth, also the MIT- Action Plan includes methods and opportunities for citizen involvement like Public Hearings; Communication Via the Internet; Information via the PRDOH Website; Citizen Advisory Committee(s); Participatory Engagement; and Other Methods for Citizen Participation. Regarding your comments on Advisory Committee, PRDOH is always looking for new protocols and methods for Citizen Participation.

Integrate with R3 to avoid forced displacement.

We are glad to hear that you welcome the amendments embedded in the Fourth Amendment to the CDBG-DR Action Plan that allow individuals who are only eligible for relocation due to the unsafe conditions of their home to wait for the mitigation process to determine whether to accept relocation assistance or whether to use the assistance of mitigation programs. This without prejudging the right of people to relocate when they need or want it.

PRDOH is actively working to use the CDBG-MIT grant, in combination with FEMA Hazard Mitigation Assistance (HMA) programs, mitigation projects funded by the US Army Corps of Engineers (USACE), and projects of other federal entities, offers Puerto Rico true potential for mitigating loss of life and damage to critical infrastructure for the future.

Minimization of displacement by mitigation projects

PRDOH have our communities in mind. We understand that impacts caused by displacement in this type of initiatives. PRDOH, believes that our participation program provides tools to invest in communities and avoid at maximum possible any disruption to the social, cultural and identity of the affected communities. Every project funded in part or in full by CDBG-MIT funds, and all activities related to that project, are subject to the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended and section 104(d) of the Housing and Community Development Act of 1974 (HCDA), except where waivers or alternative requirements have been provided by HUD. Additional modifications to increase accessibility for applicants or household members of applicants who have access and functional needs is an allowable part of the repair, reconstruction, or relocation assistance provided by the Program. Eligible applicants who require additional accessibility accommodations will be provided with accessibility options during the preconstruction meeting (for repair or reconstruction) or during the pre-award meeting (for relocation). Additional reasonable permanent accessibility options will be available to applicants if the applicant or a member of the household requires such accommodations. The costs associated with the accommodations may be considered in addition to the Program caps and evaluated for cost reasonableness. (The Uniform Relocation Act and Anti-Displacement Policy, as well as all General Policies are available in English and Spanish at <https://www.cdbgdr.pr.gov/en/resources/policies/general-policies/> and [https://www.cdbgdr.pr.gov/recursos/politicas/politicas-generales/.](https://www.cdbgdr.pr.gov/recursos/politicas/politicas-generales/))

Housing mitigation program

The Housing Mitigation Program is available to households that reside in the FEMA Advisory 100-year Floodplain and shall include homeowner applicants currently in

the CDBG-DR R3 program that are seeking alternative solutions to relocation. R3 applicants will be given the chance to decide if they would like to apply to the Housing Mitigation Program or accept the relocation award from the R3 Program. Should they choose the former, eligibility acceptance can be expected because eligibility requirements can be designed to be substantially similar to those for R3. PRDOH, believes that using the Housing Title Clearance Program under CDBG-DR will increase household ability to qualify for insurance.

Infrastructure Mitigation Program

In terms your comments regarding the Infrastructure Mitigation Program, as we mentioned earlier, HUD has created a new standard for the evaluation of larger-scale infrastructure projects by introducing the concept of Covered Projects. These projects are also required to demonstrate how the benefits of the Covered Project outweigh the costs. Grantees and subrecipients may use FEMA-approved methodologies and tools to demonstrate the cost effectiveness of their projects. FEMA has developed the Benefit Cost Analysis (BCA) Toolkit to facilitate the process of preparing a BCA. Also, we are always looking for new protocols and methods to integrate Citizen Participation process to the project's decision making.

036 | Comment ID: 11/16/20_WP_I_Resident of Puerto Rico_Rosa Mercedes Mateo Maldonado(1)

Comment: *My daughter Rosa Mercedes Zambrana Mateo along with her husband and three children come to live in Puerto Rico again as of November 23, 2020, she bought a piece of land and needs money to build a house. How can you help her build a house so that she can live in it together with her husband and young children, they are legally married. Thank you for the attention you can give to this situation. Thank you**

PRDOH Response: Homebuyer assistance is not something that is offered through the PRDOH CDBG-MIT Program. It is, however, an available option through the CDBG-DR Homebuyer Assistance Program. In addition, CDBG-DR has a Housing Counseling Program which promotes understanding of housing and financial options such as: financial literacy, home buyer counseling, credit repair counseling, mitigate default/foreclosure proceedings, etc.

For more information, please contact the PRDOH call center at 1-833-234-CDBG / 1-833-234-2324, email infoCDBG@vivienda.pr.gov or find detailed information about CDBG-DR housing programs at the following link: <https://cdbg-dr.pr.gov/programas/vivienda/>.

037 | Comment ID: 11/16/20_WP_I_Resident of Puerto Rico_Carmelo Rodriguez Morales(1)

Comment: Yes

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

The United States Department of Housing and Urban Development (HUD) allocated Puerto Rico \$ 8.285 billion in funds from the Mitigation Community Development Block Grant (CDBG-MIT). The Puerto Rico Department of Housing (PRDOH) will administer these funds. The funding allocation for CDBG-MIT is different from that of the Community Development Block Grant for Disaster Recovery (CDBG-DR).

PRDOH
Response:

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

The first step in accessing these funds is to develop and submit to HUD the CDBG-MIT Action Plan that describes how the funds will be used. Once the Plan is approved, PRDOH will announce the programs and the program guidelines availability.

038	Comment ID: 11/18/20_WP_PFP_Fundacion Comunitaria de Puerto Rico_Javier Rivera(1)
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Comment: *This proposal is the complement of those previously submitted.**

Mr. Rivera,

PRDOH
Response:

Thank you for your comments. The list of projects presented was received and is part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

039	Comment ID: 11/18/20_WP_SGA_Universidad de Puerto Rico_Inocencio Rodriguez Gonzalez(1)
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Comment: *Dean of Administration**

Mr. Rodriguez,

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

040

Comment ID: 11/18/20_WP_NGO_PUERTO RICO SCIENCE TECHNOLOGY AND RESERACH TRUST_Johnny Lugo Vega(1)

Comment:

SEE ATTACHED DOCUMENT*

PRDOH
Response:

Thank you for your comments. Yes, the Risk and Asset Data (RAD) Collection Program will use and expand the database standards and data collection, sharing, and mapping protocols developed under the CDBG-DR GeoFrame Program to include standards and protocols relevant to hazard, risk and asset layers.

041

Comment ID: 11/18/20_WP_I_Resident of Puerto Rico_Dario R. Martin(1)

Comment:

CDBG-DR Department of Housing

Dear

Subject: INNOVATION - I offer "CASA del FUTURO", self-supplied with Renewable Energies

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

It also has a power charger for electric vehicles, which are about to hit the market.

This house is ideal for: self-sustainable urban residential developments, Social Housing, Eco Villages, isolated or connected to the electricity grid, mountain range, rural, semi-urban, islands, cabins, rural hotel and others.-

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

PIRAMID-ALL

*<https://www.piramidall.com> **

PRDOH
Response:

Procurement under CDBG programs must follow specific federal requirements. For more information on these requirements, and how to be a potential service provider for CDBG-DR or CDBG-MIT, we encourage you to review the Procurement section on the CDBG-DR website: <https://www.cdbg-dr.pr.gov/en/adquisiciones-y-nofa/>.

042

Comment ID: 11/18/20_WP_I_Resident of Puerto Rico_Kaisa Nieves(1)

Comment: *What are you, I don't understand**

PRDOH
Response:

The United States Department of Housing and Urban Development (HUD) allocated Puerto Rico \$ 8.285 billion in funds from the Mitigation Community Development Block Grant (CDBG-MIT). The Puerto Rico Department of Housing (PRDOH) will administer these funds. The funding allocation for CDBG-MIT is different from that of the Community Development Block Grant for Disaster Recovery (CDBG-DR).

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

The first step in accessing these funds is to develop and submit to HUD the CDBG-MIT Action Plan that describes how the funds will be used. Once the Plan is approved, PRDOH will announce the programs and the program guidelines availability.

043

Comment ID: 11/18/20_WP_SGA_Universidad de Puerto Rico, Molecular Sciences Research Center_Belkis Fabregas(1)

Comment:

*I include the CDBG-MIT Stakeholder Participation Proposed Projects Log from the Molecular Sciences Research Center of the University of Puerto Rico. In it are four mitigation project proposals for the facilities.**

Mrs. Fabregas,

PRDOH
Response:

Thank you for your comments. The list of projects presented was received and is part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

044 Comment ID: 11/19/20_WP_SGA_Universidad de Puerto Rico_Dr. Ubaldo Cordova, Vice Presidente UPR(1)

Comment: *Attached are the activities to be included under Appendix D**

PRDOH Response: Dr. Ubaldo,
Thank you for your comments. The list of projects presented was received and is part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

045 Comment ID: 11/19/20_WP_SGA_Instituto de Cultura Puertorriqueña_Carlos Ruiz(1)

Comment: *Information to be included in Appendix D**

PRDOH Response: Mr. Ruiz,
Thank you for your comments. The list of projects presented was received and is part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

046 Comment ID: 11/19/20_WP_I_Resident of Puerto Rico_Yiamar Rivera Matos(1)

Comment: *See attached document.**

PRDOH Response: Thank you for your comments. PRDOH acknowledges the significant role that renewable energy sources can play in improving the energy system's resilience and, in particular, the resilience of vulnerable populations in Puerto Rico. PRDOH also appreciates your suggestions and will take them into consideration during the future development of program guidelines.

047 Comment ID: 11/19/20_WP_I_Resident of Puerto Rico_Luis A Martinez(1)

Comment: *I am interested since I want to purchase my first home**

PRDOH Response: Based on the information provided, we believe that this question is related to the Homebuyer Assistance Program. For more information about said program, please refer to its webpage: <https://www.cdbg-dr.pr.gov/en/download/homebuyer-assistance-program/>. In addition, we've referred your comments to the corresponding CDBG-DR contact.

048 Comment ID: 11/19/20_WP_I_Resident of Puerto Rico_Manuel E Perez(1)

Comment: *action plan for energy*

PRDOH Response: Thank you for your comment. Power grid projects will be in a separate allocation under CDBG-DR, and will need to be discussed in detail. However, CDBG-MIT has the opportunity to provide assistance to fund alternative energy solutions for homes and buildings.

049 Comment ID: 11/20/20_WP_FGA_Department of Interior, NCR RSF_Debra L Payton(1)

Comment: *Thank you for this opportunity, I have uploaded a document with comments in my role as the Natural and Cultural Resources Recovery Support Function Coordinator*

PRDOH Response: Thank you for your comments and suggestions. PRDOH has included revisions to the draft Action Plan that address and incorporate select recommendations and edits.

PRDOH Response: The Risk and Asset Data (RAD) Collection Program will use and expand the database standards and data collection, sharing, and mapping protocols developed under the CDBG-DR GeoFrame Program to include standards and protocols relevant to hazard, risk and asset layers such as cultural assets.

We have also noted your comments on the Mitigation and Adaptation Policy Support Program and its potential to support the update and implementation of cultural asset preservation.

050 Comment ID: 11/20/20_WP_NGO_Fundación Oye Aguadilla_Richard Lee Cuevas(1)

Comment: *Cdbg funda are more restrictive every day. Less people qualify. How can we make the program more accessible to more people?*

PRDOH
Response:

CDBG-MIT will provide funding to support mitigation programs, policies, and projects. Mitigation, according to HUD, includes activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters.

PRDOH recommends that the needs of all citizens in urban and rural locations, and in particular vulnerable populations, be taken into consideration and that these be part of the mitigation plans of regional consortia which should include municipalities as a partner.

051 Comment ID: 11/20/20_WP_NGO_Para la Naturaleza, Inc._Kathleen Z. Rodríguez(1)

Comment:

My name is Kathy Rodríguez and I am part of the team at Para la Naturaleza, a non-profit organization dedicated to environmental conservation and historic preservation. Today I am at Hacienda La Esperanza, next to the Rio Grande de Manatí, where we have been implementing a coastal resilience project through reforestation thanks to the support of the National Fish and Wildlife Foundation, one of our collaborators. PLN is leading a massive reforestation effort in the islands of Puerto Rico, a key strategy in mitigation plans.

For more than five decades, Para la Naturaleza has been given the task of preserving natural areas and historic places, always seeking to facilitate and support the sustainable recovery of the islands of Puerto Rico. We firmly believe that solidarity with nature is the best alternative for preparing, recovering and building resilience against future disasters.

Today, we reiterate the importance of the CBBG-MIT Action Plan incorporating and promoting mitigation projects that integrate green infrastructure methods both in their planning and implementation. We also reiterate as essential that the third sector has the opportunity to receive funds directly to lead and execute projects within the various areas of the plan.

Today, in addition, we point out three projects in which Para la Naturaleza is willing and ready to participate, as collaborators and sub-recipients, who serve several of the vital resources of the communities, such as their safety and protection.

First, projects that generate community resilience plans and studies. These help us to understand the functionality and current conditions of our ecosystems, to be able to make effective restorations in accordance with the Land Use Plan. Projects such as the development of hydrological studies for the Barrio Bajura wetland in Isabela, which help us understand how to reduce threats to human life and public infrastructure.

Second, green infrastructure projects, such as reforestation. These methods help stabilize soils, create riparian corridors, and improve water quality. Projects such as: the stabilization of soils in the area of the Old Aqueduct of the Río Piedras, the creation of a riparian corridor in the Fajardo River and the restoration of the Jobos wetland in Isabela. We also recommend the incorporation of green infrastructure projects in coastal areas, including the restoration of dunes, forests

and wetlands in places such as Cabezas de San Juan, Ceiba and the PR-250 in Culebra. These actions help protect our coasts and their communities. ,

Third, projects that protect human life. Specifically, projects that provide housing resistant to the onslaught of future disasters, such as the relocation of more than 20 families in the community of El Negro, in the Inés María Mendoza nature reserve in Yabucoa.

We appreciate this forum and reiterate our commitment to mitigation actions in favor of the resilience of our country.*

PRDOH
Response:

Thank you for your comments. PRDOH recognizes the importance of the role green infrastructure can play in mitigating the impacts of future disasters and has made several revisions and additions to the action plan draft that provide various strategies for incorporating green infrastructure to improve mitigation project outcomes and benefits.

PRDOH acknowledges the important role that the environmental community plays in mitigative activities in Puerto Rico, and looks forward to the future opportunities for collaboration. The Planning and Capacity Building Program will encourage additional and strengthened partnerships and the opportunity for resources to increase individual and organizational capacity.

Please acknowledge that all projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

052	Comment ID: 11/20/20_WP_FGA_US Environmental Protection Agency (EPA)_Carmen R. Guerrero Perez(1)
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Comment: *Thank you for the opportunity to comment!*

PRDOH
Response:

Thank you for your expansive comments and suggestions. PRDOH has included revisions to the draft Action Plan that address and incorporate select recommendations and several edits. Most notable are: 1) changing all reference to “solid waste management sector” and “solid waste” to “materials management sector,” 2) relocating the “Materials Management Sector” under the Food, Water, and Sheltering Lifeline instead of the Hazardous Materials lifeline, and 3) adding suggested contributors and mitigators to water, energy, and sustainability narrative, and 4) adding the information provided about the Hazardous Materials lifeline to the needs analysis narrative.

Additionally, many of the suggestions and resources you have provided are more appropriate for consideration during the development of the Mitigation Program guidelines.

053	Comment ID: 11/20/20_E_NGO_Comite Dialogo Ambiental, Inc., Sierra Club Puerto Rico, Comité Yabucoeño Pro-Calidad de Vida, Alianza Comunitaria Ambientalista del Sureste, Mayagüezanos por la Salud y el Ambiente, Amigos del Río Guaynabo, Coalición de Organizaciones Anti-Incineración, El Puente-Enlace Latino de Acción Climática_Ruth Santiago(1)
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Greetings,

Attached are the comments for the following organizations to the Puerto Rico Community Development Block Grant-Mitigation ("CDBG-MIT") Action Plan:

Comment: *Comite Dialogo Ambiental, Inc.,
Sierra Club Puerto Rico,
Comité Yabucoeño Pro-Calidad de Vida,
Alianza Comunitaria Ambientalista del Sureste,
Mayagüezanos por la Salud y el Ambiente,
Amigos del Río Guaynabo,
Coalición de Organizaciones Anti-Incineración
El Puente-Enlace Latino de Acción Climática*

Favor de acusar recibo de los mismos.

*Cordially,**

PRDOH Response: Thank you for your comments. PRDOH acknowledges the significant role that renewable energy sources can play in improving the energy system's resilience and, in particular, the resilience of vulnerable populations in Puerto Rico. PRDOH also appreciates your suggestions and will take them into consideration during the future development of program guidelines.

054	Comment ID: 11/20/20_E_NGO_Hispanic Federation_Maritere Padilla Rodríguez(1)
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Dear Secretary Fernández Trinchet:

Comment: *On September 21, 2020, the Puerto Rico Department of Housing published the Puerto Rico Mitigation Plan for the Community Development Mitigation Block Grant Program (CDBG-MIT). For this reason, the Hispanic Federation presents its comments on said plan in due course.*

*Thank you very much,**

Thank you for your comments. Your general recommendations to the CDBG-MIT Action Plan are noted. Summary responses to several of your comments presented in Section 2 of your document, "SPECIFIC RECOMMENDATIONS FOR SECTIONS OR PROGRAMS OF THE CDBG-MIT ACTION PLAN", are provided below.

Your comments regarding the Vulnerability Analysis are noted. The Social Vulnerability Index (SoVI) considers twenty-nine (29) variables known to influence the ability of social groups and communities to prepare for, respond to, and recover from disasters. Socially vulnerable populations, per SoVI, have no direct correlation with population or infrastructure density.

Your comments regarding the Integrated Resource Plan (IRP) are noted. At the moment, this regulation is before the consideration of the Puerto Rico Energy Bureau. If it is approved before the final adoption of the Action Plan, we will take into consideration any obligation of the plan that arises from its adoption.

Your comments regarding the agricultural industry and the Secondary Lifeline Sector in Food, Water, and Shelter are noted. Both the Planning and Capacity Building Program and the Economic Development Investment Portfolio for Growth – Lifeline Mitigation Program may be resources for the mitigation initiatives and the technical assistance needs you identify.

PRDOH
Response:

Your comments regarding the Benefit Cost Analysis requirements for Covered Projects are noted. PRDOH adheres to federal requirements for BCA requirements under HUD and FEMA guidelines. All acceptable methods shall be published in Program Guidelines once programs are launched. Federal Register Vol 84, No. 169, (8/30/20), 84 FR 45857 states, " This qualitative description may include a description of how the Covered Project will provide benefits SUCH AS (emphasis added) enhancing a community's economic development potential, improving public health and or expanding recreational opportunities." This does not preclude the additional consideration of "economic, social, and environmental factors" in an alternative BCA when appropriate.

Your comments regarding the Housing Mitigation Program are noted. The program is available to households that reside in the FEMA Advisory 100-year Floodplain and shall include homeowner applicants currently in the CDBG-DR R3 program that are seeking alternative solutions to relocation. R3 applicants will be given the chance to decide if they would like to apply to the Housing Mitigation Program or accept the relocation award from the R3 Program. Should they choose the former, eligibility acceptance can be expected because eligibility requirements can be designed to be substantially similar to those for R3. PRDOH acknowledges the important role that community participation plays in mitigative activities in Puerto Rico, and looks forward to the future opportunities for collaboration. Also, any applicant to the Programs under the Mitigation Action Plan will need to comply with Local and Federal Regulation Requirement.

Your comments regarding Opportunity Zones implementation in Puerto Rico are noted. In addition to numerous references to alignment with other federal and public investments, the Federal Register Vol 84, No. 169, (8/30/20) 45849 states, "Grantees are also strongly encouraged to leverage CDBG-MIT funds in economic development through coordination with Opportunity Zones established within the grantee's jurisdiction."

Your comment regarding the opportunity the Resilient Community Power and Water Facilities Program represents to meet the needs of low and moderate income individuals is noted. CDBG funded programs, by design, prioritize the needs of Low to Moderate Income Individuals (LMI) through the requirement that a minimum percentage (51% of funds in the case of CDBG-MIT) of funds expended meet the LMI National Objective. PRDOH also recognizes the vulnerability that LMI communities with Non-PRASA water systems face with respect to power outage and associated water system outages and the role CDBG-MIT funds can play in improving their resilience.

PRDOH acknowledges the significant role that renewable energy sources can play in improving the energy system's resilience and, in particular, the resilience of vulnerable populations in Puerto Rico. PRDOH also appreciates your suggestions and will take them into consideration during the future development of program guidelines.

055 | Comment ID: 11/20/20_WP_PFP_Power Solar LLC_Ruben Casillas(1)

Comment: *The idea should be implementing projects similar to what the American Red Cross did for public schools in the island after Maria for the commercial side to whom qualifies for. In the residential side, it should be no different than how the green energy fund worked in the past but with more enhanced, quicker and more efficient guidelines that could be more accessible and reachable in a faster way for the public to execute their private projects in a timely fashion.*

PRDOH Response: We appreciate your comments. In the development of program rules and guidelines, PRDOH will incorporate best practices, such as the lessons learned from the implementation of similar programs such as the Green Energy Program.

056 | Comment ID: 11/20/20_WP_NGO_Comite de Expertos y Asesores de Cambio Climatico_Rafael Machargo Maldonado(1)

Comment: *Comments on the CDBG-DR and MIT Action Plan are submitted and request consideration for CDBG-DR**

Your comments have been received.

Throughout your document, the CEACC makes references to pages and sections that do not exist in the CDBG-MIT Action Plan. Comments to the CDBG-DR Action Plan are not being considered through this process.

In general, we would refer you again to the CDBG-MIT Action Plan, in particular:

1) The reduced solid waste and landfill capacity is considered within the Risk Based Mitigation Needs Assessment Section in the Action Plan, under the **Food, Water, and Sheltering** Lifeline.

2) Severity of Consequences Section described the Severity of Consequence Calculation equation which uses equal parts Historical Consequence, Climate Sensitivity, a measure of probability versus consequence, and a measure of future impacts (or high priority hazards for Puerto Rico) derived from the Government of Puerto Rico's current Hazard Mitigation Plan. Climate Sensitivity was an analyzed factor where hazards were classified zero or one (0 or 1) on the connection to current and future weather. If a hazard's root cause is meteorological (floods, hurricanes, heat, hail, etc.) it is climate sensitive and scored with a one (1). If a hazard is geophysical (earthquake, tsunami, etc.) it is not climate sensitive and is scored with a zero (0).

3) On the other hand, Sea Level Rise, which is a climate change sensitive hazard, was one of the eighteen (18) hazards documented and incorporated into the Risk Analysis.

4) The Law 33-2019 is indeed noted in the Action Plan, and a footnote has been added to provide more specific reference.

5) Finally, the public comments mention several specific projects or potential mitigative activities, e.g., reforestation. The Action Plan does not preclude these types of activities, and PRDOH would anticipate projects such as these will be submitted for consideration under CDBG-MIT funding programs once they are operational.

PRDOH
Response:

057	Comment ID: 11/20/20_E_NGO_Centro para la Reconstrucción del Hábitat, Inc._Luis Gallardo Rivera(1)
-----	--

Greetings,

Please see attached document.

Comment:

Luis Gallardo Rivera
Co-director
*Center for Habitat Reconstruction, Inc. **

PRDOH
Response:

Thank you for your comments. We appreciate your recommendation, and have included it as a potential outcome in the Risk and Asset Data Collection Program in the CDBG-MIT Action Plan. Having no jurisdiction to compel municipalities to

participate in an inventory program, the CDBG-MIT program can currently only anticipate voluntary participation if such an effort were to be undertaken. We also want to add that the Risk and Asset Data Collection Program will build on the foundation of the spatial data infrastructure created under the GeoFrame Program, which among expected outcomes is delivering a cadastral database that enables an increased understanding of residents and housing stock in relation to geographic risks, as well as a publicly available mapping of land use plans.

We have noted your comments on the Mitigation and Adaptation Policy Support and Planning and Capacity Building Programs and their potential to support the updating and implementation of local building codes. The Planning and Capacity Building Program proposed in this Action Plan may already be a potential funding source for the specific costs you mention and for which you suggest an explicit statement of such in the Action Plan, if approached on a multi-jurisdictional basis. In addition, more explicit language regarding eligible costs would be most appropriately determined after the completion of the inventory recommended in your previous comment under the Risk and Asset Data Collection Program, and other future potential outcomes of the Mitigation and Adaptation Policy Support Program.

058 | Comment ID: 11/20/20_WP_PFP_CAT5 Building Systems and Materials LLC and CAT5 Solar and Microgrids LLC_Malcolm J. Wright(1)

Comment: *Please find attached our comments regarding the Puerto Rico proposed CDBG-Mitigation Action Plan*

PRDOH Response: Thank you for your comments. PRDOH acknowledges the significant role that construction standards and renewable energy technology can play in improving the resilience of housing in Puerto Rico.

059 | Comment ID: 11/20/20_WP_SGA_Puerto Rico Highway Transportation Authority_Rosana M. Aguilar Zapata(1)

Comment: *See Attach*

PRDOH Response: Thank you for your comment. These COAs are already included in the Action Plan with the exception of TXN 5 as road maintenance and repair is not a standalone mitigative activity.

060 | Comment ID: 11/20/20_WP_NGO_Sociedad Espeleológica de Puerto Rico_Marie Montes Nieves(1)

Comment:

The Speleological Society of Puerto Rico Inc. (SEPRI) was founded in 1976 as a professional, scientific and non-profit organization. Our purpose is the exploration, documentation, study, research, conservation and protection of values Caving in Puerto Rico. They will wonder about the relevance of a caving organization in matters of public policy for communities and housing. It happens that in Puerto Rico many communities and therefore many houses are located on or near cave systems and / or in areas of In addition, many communities and therefore many residences in some and different ways are supplied with water resources linked to cave systems and / or aquifers. It is here that for decades the SEPRI has contact and relationship with many of these communities and We have observed how this situation affects both communities and the quality of natural resources and impoverishment. or the health of these natural systems and their potential and natural values.
In the attached document, points to be considered in this Action Plan*

PRDOH
Response:

Thank you for your comments regarding the experience and value of Non-Governmental Organizations (NGOs) in Puerto Rico. They have been an essential part of the public engagement and planning process, and are proposed eligible applicants of the majority the CDBG-MIT funding programs. Several of your specific recommendations are more appropriately considered for inclusion in program guidelines as they are developed. Programs guidelines will be developed and released after approval of the Action Plan by HUD.

061

Comment ID: 11/20/20_WP_NGO_Puerto Rico Science Technology and Research Trust - RBI_Gilberto Guevara(1)

Comment: Attached is the document with the recommendations being submitted

PRDOH
Response:

Thank you for your comments. PRDOH will take your suggestions into consideration in revisions to the draft Action Plan and future program guidelines.

062

Comment ID: 11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)

Comment: See attached documents.*

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. Proposed projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.
Thank you for your comment. PRDOH, in the face of the difficulties imposed by the Covid-19 Pandemic, employed multiple strategies to maximize citizen participation in the development of the Action Plan which are detailed in a

Stakeholder Engagement Report attached to the Action Plan. We invite you to review the details of the report.

Regarding Program Income, PRDOH will consider your suggestion into consideration under future amendments to the Action Plan, after the program is implemented.

Finally, with respect to the identification and mapping of communities not currently served by PRASA, PRDOH lacks sufficient data to publish a comprehensive map, at this time. Such activity is contemplated for inclusion under the Capacity Building portion of the Program.

063 | Comment ID: 11/20/20_WP_NGO_CAMBIO_Ingrid M. Vila Biaggi(1)

Comment:
See attached documents.*

PRDOH Response:
Thank you for your comments. In reference to the inclusion of waste to energy, it was offered as one of several examples of alternative energy solutions provided in the Action Plan. We appreciate your previous participation in roundtables, which did serve as an important resource for the Action Plan. A review of existing literature also served as a resource to the planning process, and the reference to waste to energy was a recommendation provided by the US Department of Energy (US Department of Energy, Energy Resilience Solutions for the Puerto Rico Grid. Final Report June 2018. Accessed at: https://www.energy.gov/sites/prod/files/2018/06/f53/DOE%20Report_Energy%20Resilience%20Solutions%20for%20the%20PR%20Grid%20Final%20June%202018.pdf). When implemented responsibly, waste to energy is a valid material management practice. In fact, it remains in both the EPA waste management hierarchy and Puerto Rico's waste management hierarchy as established in Municipal Code of Puerto Rico, Law 107-2020. Reference to waste to energy has been removed from the Action Plan due to limited support for its implementation in Puerto Rico.

Seeking regional solutions is encouraged throughout the Federal Register and was echoed throughout the public engagement process. Encouragement to seek regional solutions and leverage cooperation and partnerships is in no way intended to preclude municipalities and communities, but instead to capitalize on the shared resources and solutions they can provide for mutual benefit and efficiencies that can be realized in minimizing duplicative efforts.

In addition, PRDOH acknowledges the significant role that renewable energy sources can play in improving the energy system's resilience and, in particular, the resilience of vulnerable populations in Puerto Rico. PRDOH also appreciates your suggestions and will take them into consideration during the future development of program guidelines, such as those which fall under HUD's Green Building Standards.

064 | Comment ID: 11/20/20_WP_I_Resident of Puerto Rico_RAFAEL BLANCO RIVERA(1)

I want to make a clarification about the urban train and they describe it as a light transport and it is a heavy transport. Heavy transport has wider tracks than regular routes.

Comment: 2. *The program mentions that there may be similarities of historical or architectural value eg: acquisition of solar water panels. There is nothing of historical or archeological value to be able to improve for damage suffered by disasters or require mitigation for reliability to future events. since it is a strong of the tourism the places of historical value.**

PRDOH Response: Thank you for the clarification, this edit has been incorporated.

065 Comment ID: 11/20/20_WP_NGO_Distributed Wind Energy Association_Michael L.S. Bergey(1)

Comment: *See attached letter*

PRDOH Response: Thank you for your comments and suggestions in the attached document. PRDOH acknowledges the role that wind energy plays in the renewable energy space and the importance of allowing a variety of solutions towards energy resilience and has revised this section of the Action Plan accordingly.

066 Comment ID: 11/20/20_E_NGO_El Puente-Enlace Latino de Acción Climática Puerto Rico (ELAC)_Grace Blanco(1)

Greetings,

Receive greetings from the organization El Puente-Enlace Latino de Acción Climática Puerto Rico. We attach a document with our organization's comments to the draft Action Plan for the use of CDBG-MIT funds.

We remain attentive to this process, and to any additional information regarding the comments.

Comment: -
Grace Blanco, MSW
Community Link | Community Liaison
El Puente-Latino Climate Action Network
800 Ave. R.H. Todd, Suite 102
San Juan, Puerto Rico 00907
787-545-5118
<http://caminatacc.org/>
<https://elpuente.us>

Thank you for your comments. In terms of Public Participation, please refer to the Stakeholder Engagement Report for detailed information regarding the outreach and engagements efforts carried out throughout the Action Plan development process. Also, Community-based development organizations, private non-profits and Non-governmental organizations are eligible entities in many of our CDBG-MIT Programs.

Regarding the suggested action regarding energy costs and dependence on fossil fuel in homes, please refer to the Community Energy and Water Resilience Installations Program and it's three subprograms.

PRDOH
Response:

When determining risk that considers changing environmental conditions, as part of the Risk Assessment, and in addition to the Hazard Analysis that considers climate induced sea level rise, climate sensitivity influences the severity of consequence for those hazards that have the potential to become more severe in force as a result of climate change, i.e. hurricane wind and storm surge, wildfires, flooding, sea level rise, landslide, drought, severe storm, fog, lightning, tornado, wind, hail, and heat. Considering the Risk Assessment, the product of severity of consequence, vulnerability, and threat yields risk and higher severity of consequence is often associated with higher risk. In the Infrastructure Mitigation Program, projects that mitigate risk from hazards, including those hazards that are climate sensitive, will be prioritized based on the magnitude of mitigation. In addition to the mitigation of risk, and per the 84 FR 45850, Covered Projects must reflect changing environmental conditions with risk management tools.

067	Comment ID: 11/20/20_E_NGO_La Liga de Ciudades de Puerto Rico_Cristina M. Miranda Palacios(1)
Comment:	<p><i>Greetings,</i></p> <p><i>We are sharing La Liga's comments regarding CDBG-MIT.</i></p> <p><i>Cordially,</i></p> <p><i>cristina</i></p> <p><i>---</i></p> <p><i>Cristina M. Miranda Palacios, MCP, CHP</i></p> <p><i>Founding Executive Director *</i></p>

PRDOH
Response:

Cristina M. Miranda Palacios, MCP, CHP Founding Executive Director, Liga de las Ciudades: Thank you for your submission. We acknowledge receipt of your comments and proposal. It has become part of the public comment record. PRDOH acknowledge the importance of Municipalities in our disaster mitigation efforts. We understand that municipalities are key elements in the fulfillment of this goal. As you mentioned in your comments, we also believe in strengthening the communication with municipalities and involve them in our efforts to make a more resilience Puerto Rico. We understand that your organizations can be an effective liaison to fulfill those goals. Official from the PRDOH will be in touch with you to start any conversation addressed to combine efforts between our organizations.

068

Comment
ID:

11/20/20_WP_I_Resident of Puerto Rico_Carlos Morales(1)

Comment:

- 1. Please clarify the difference between subrecipient and direct distribution methods. When applying the direct distribution model, will PRDOH perform grant administrative duties, procurement, construction management, and project management activities? Under the subrecipient method, will the subrecipient perform grant administrative duties, procurement, construction management and project management activities?*
- 2. The needs assessment and supporting analytics do not seem to align with the Programs being proposed in the Action Plan. How do you reconcile this observation?*
- 3. Do you intend on distributing the \$2 billion for Housing to the four R-3 Housing Program Managers for distribution rather than create yet another program?*
- 4. There seems to not be an overall plan to address drainage issues. Why not utilize the funds to develop such a plan and implement?*
- 5. There seems to be very little detail on the programs especially the Community Energy and Water Resilience Installation Program. Can you provide further insight into how you envision those funds being distributed?*

PRDOH
Response:

1. Yes.
- CDBG-MIT programs directly tie to the Risk-Based Mitigation Needs Assessment and have been designed to meet the mitigation needs reported by stakeholders and gathered through data analysis.
- The CDBG-DR allocation (under which the R-3 Program is funded) and the CDBG-MIT allocation have different requirements according to the Federal Register notices published by HUD. Thus, the CDBG-DR and CDBG-MIT programs have different focus, as stipulated by HUD. CDBG-DR funds focus on the recovery of Puerto Rico related to the impacts of Hurricanes Maria and Irma. The CDBG-MIT funds focus on mitigating the risks from future disasters, which requires a program that mitigates risks to housing from future disaster impacts.

4. PRDOH recognizes the importance of mitigating future flood risks to increasing the resilience of Puerto Rico. To that end, the Risk Assessment and Action Plan identify flooding among the highest risks for most areas in Puerto Rico and mitigation of those flooding risks as a top need. PRDOH has included Programs and eligible activities to address flood risks including the Regional Capacity Building program to increase systemic capacity to mitigate risks from future disasters across Puerto Rico, particularly the risks due to flooding. In addition, PRDOH included the Mitigation Infrastructure Program to allow communities to request funding of projects that mitigate flood risks according to their needs.

5. The details of program design for the Community Energy and Water Resilience Installation Program will be included in the Program Guidelines after approval of the Action Plan by HUD, which is anticipated in the first Quarter of 2021.

069 | Comment ID: 11/20/20_E_PFP_Distributed Wind Energy Association (DWEA)_Mike Bergey(1)

"Dear VIVIENDA,

Please find attached comments submitted today (via the public comment form) on the CDBG-MIT Action Plan by the Distributed Wind Energy Association (DWEA).

Comment:

We thank you for this opportunity.

*Best Regards,
Mike Bergey
DWEA President*

PRDOH
Response:

Thank you for your comments. PRDOH acknowledges the role that wind energy plays in the renewable energy space and the importance of allowing a variety of solutions towards energy resilience and has revised sections of the Action Plan accordingly.

070 | Comment ID: 11/20/20_E_NGO_Ridge to Reefs and Mujeres de Islas_Phul Mantha(1)

Good Afternoon,

Please find attached a joint proposal from Ridge to Reefs and Mujeres de Islas titled "Culebra Communities Project Action Plan". We hope that this project can be considered as part of Puerto Rico's rehabilitation process and funding availability. Thank you for your time and consideration.

Comment:

*Warm Regards,
Phul Mantha
Director of Agriculture and Sustainability
Ridge to Reefs, Inc.*

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

071

Comment ID: 11/20/20_WP_PFP_Bayamón Medical Center Corp., dba Bayamón Medical Center_Omar Negrón-Cabrera, P.G.(1)

Comment:

Bayamón Medical Center Corp., dba Bayamón Medical Center as the proposing entity submitted on October 13, 2020 at 7:48pm thru the 'cdbg-mit@vivienda.pr.gov' email the CDBG-MIT Stakeholder Participation Proposed Projects Log with the requested information. On October 14, 2020 at 8:30am our consultants received acknowledgement that the Letter of Intent (LOI) was received. Nevertheless, a review of the lists of projects in the CDBG MIT web site does not reflect our facility included. Therefore, our consultant is re-submitting our request. Enclosed the documents submitted that day.

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

072

Comment ID: 11/20/20_E_MGA_Municipio de Canóvanas_MANUEL A.G. HIDALGO(1)

Comment:

Good afternoon:

Attached is the proposal from the Municipality of Canóvanas for CDBG-DR MIT.

Cordially,

*-
MANUEL A.G. HIDALGO, MPL, PPL
Director
Office of Planning and Economic Development
Autonomous Municipal Government of Canóvanas**

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

073

Comment ID: 11/20/20_WP_PFP_Puerto Rico Women and Children's Hospital LLC_Omar Negrón-Cabrera, P.G.(1)

Comment:

Puerto Rico Women and Children's Hospital LLC as the proposing entity submitted on October 13, 2020 at 7:56pm thru the 'cdbg-mit@vivienda.pr.gov email the CDBG-MIT Stakeholder Participation Proposed Projects Log with the requested information. On October 14, 2020 at 8:36am our consultants received acknowledgement that the Letter of Intent (LOI) was received. Nevertheless, a review of the lists of projects in the CDBG MIT web site does not reflect our facility included. Therefore, our consultant is re-submitting our request. Enclosed the documents submitted that day.

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

074

Comment ID: 11/20/20_WP_PFP_Dorado Health, Inc. dba Manati Medical Center_Omar Negrón-Cabrera, P.G.(1)

Comment:

Dorado Health, Inc. dba Manati Medical Center as the proposing entity submitted on October 13, 2020 at 7:50 pm thru the 'cdbg-mit@vivienda.pr.gov email the CDBG-MIT Stakeholder Participation Proposed Projects Log with the requested information. On October 14, 2020 at 8:35am our consultants received acknowledgement that the Letter of Intent (LOI) was received. Nevertheless, a review of the lists of projects in the CDBG MIT web site does not reflect our facility included. Therefore, our consultant is re-submitting our request. Enclosed the documents submitted that day.

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

075

Comment ID: 11/20/20_WP_PFP_Mayaguez Medical Center-Dr. Emeterio Betances Inc. dba Mayaguez Medical Center_Omar Negron-Cabrera, P.G.(1)

Comment:

Mayaguez Medical Center-Dr. Emeterio Betances Inc. dba Mayaguez Medical Center as the proposing entity submitted on October 13, 2020 at 7:50 pm thru the 'cdbg-mit@vivienda.pr.gov email the CDBG-MIT Stakeholder Participation Proposed Projects Log with the requested information. On October 14, 2020 at 8:35am our consultants received acknowledgement that the Letter of Intent (LOI) was received. Nevertheless, a review of the lists of projects in the CDBG MIT web site does not reflect our facility included. Therefore, our consultant is re-submitting our request. Enclosed the documents submitted that day.

PRDOH
Response:

Thank you for your comments. The list of projects presented were received and are part of the registry of proposed mitigation projects. The solicitation of needs through the Proposed Mitigation Projects Log, at this time, does not constitute a commitment to fund such projects. This log is to inform the Action Plan and for planning purposes. All projects must be submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

076

Comment ID: 11/20/20_E_NGO_FURIA and PRODEV_Nayda Bobonis Cabrera(1)

Comment:

Greetings,

We hope you are well. I am attaching comments. If you have any questions, do not hesitate to contact me. Thanks in advance.

--

*Nayda Bobonis Cabrera, Esq.
Public Policy Coordinator
FURIA, Inc.**

PRDOH
Response:

Thank you for your comment. PRDOH agrees that communities should take full advantage of the planning efforts under the CDBG-DR Whole Community Resilience Program to inform their plans for applying for and utilizing CDBG-MIT funds for mitigation. PRDOH further recognizes the

important role that community leaders will play in the Mitigation and Adaptive Policy Support Program, and mitigation planning and implementation activities, in general. We encourage you to read the Planning and Capacity Building Program in the CDBG-MIT Action Plan which has been designed to strengthen the capacity of state agencies, municipalities, NGOs and existing regional partnerships by assisting in the formation and/or strengthening and formalizing of existing, regional consortia to conduct mitigation enhancing activities.

We also encourage you to read the Stakeholder Engagement Report appendix to the Action Plan which outlines the activities PRDOH completed to not only meet but exceed HUD stakeholder engagement requirements in order to include meaningful stakeholder input into this Action Plan.

Additionally, Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

077	Comment ID: 11/20/20_WP_NGO_Asoociacion de Constructores de Puerto Rico_Alfredo Martinez-Alvarez, Jr.(1)
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Comment: *Comments for the CDBG-MIT Action Plan from the PR Builders Association are attached.*

PRDOH Response: Thank you for your comments. Yes, the Risk and Asset Data (RAD) Collection Program will use and expand the database standards and data collection, sharing, and mapping protocols developed under the CDBG-DR GeoFrame Program to include standards and protocols relevant to hazard, risk and asset layers.

Related to the foregoing, the legislation and regulation that governs the processes of administration and sale of real estate properties in the agencies and public corporations of the government of Puerto Rico. Once the properties would be inventoried that belong to the local government, with mitigation problems, and with some potential for development, it is highly probable that many of these disused government assets, require to be the subject of purchase, lease, concession or other agreements legal instrument with private sector companies, within a legal framework and regulatory that facilitates, simplifies and promotes mitigation and development projects economically viable on such properties that are owned by the government.

Please refer to the Mitigation and Adaptation Policy Support Program description. Said program will build on information related to policy needs across the Island collected through the stakeholder engagement and the Disaster Recovery Planning Programs in CDBG-DR. It shall also utilize, as it becomes available, the information collected under the CDBG-MIT

Planning and Capacity Building and RAD Collection Programs. Adaptation and policy support refer to the use of policy, building code, land use plans, zoning, and planning and capacity building interventions to enhance local jurisdictional and community ability to prepare and plan for, avoid, absorb, recover from, and more successfully adapt to potential risk from hazardous events.

PRDOH recognizes the significance of risk from rain induced events including flooding and landslides and has prioritized the mitigation of said risks in the Infrastructure, Housing, and Planning & Capacity Building Programs in the Action Plan.

As noted above the Mitigation and Adaptation Policy Support Program will build on information related to policy needs across the Island collected through the stakeholder engagement and the Disaster Recovery Planning Programs in CDBG-DR. It shall also utilize, as it becomes available, the information collected under the CDBG-MIT Planning and Capacity Building and RAD Collection Programs. These programs are intended to advance the use of policy, building code, land use plans, zoning, and planning and capacity building interventions to enhance local jurisdictional and community ability to prepare and plan for, avoid, absorb, recover from, and more successfully adapt to potential risk from hazardous events.

PRDOH acknowledges the usefulness of mapping infrastructure assets towards resilience and mitigation efforts. Activities such as these shall be contemplated during the development of Program Guidelines for the Planning and Capacity Building Program.

Your comments regarding streamlining of program design are noted and shall be contemplated during the development of Program Guidelines.

078	Comment ID: 11/20/20_WP_MGA_MUNICIPIO AUTÓNOMO DE GUAYNABO_María Falcón Varela(1)
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Comment:

*After having participated in all the processes carried out by the Department of Housing for the CDBG-MIT program, and having proposed projects during the month of July 2020, we are requesting that four new initiatives, of great importance, be included in the Action Plan. importance to this administration. These projects had been requested to the Puerto Rico Department of Housing, to be considered under CDBG-DR funds, specifically under the categories of Institutional Resilience of the crucial Infrastructure, and unmet housing needs - Rehabilitation and New Construction. So far we have not received funds for them, so we request that they be included in our request to the CDBG-MIT Program. I attach the GUAYNABO ADM_MIT_Template_Proposed Mitigation Projects.xls file, which contains information on each of them.**

PRDOH
Response:

Thank you for your submission. We acknowledge receipt of the projects. It has become part of the public comment record. Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

079

Comment ID:

11/21/20_WP_PFP_Trito Agro-Industrial Services Inc._Carlos E. Pacheco
Irizary P.E.(1)

On page 180 they discuss the To Energy alternative as an example of sustainable solid waste management. We object to considering this alternative for the following reasons:

- 1) This solution does not have the backing of the people of Puerto Rico and has been protested on many occasions. If it is presented again, it will receive an avalanche of protests.*
- 2) This measure depends on external support affected by the "vital lines" so it is incongruous with the resilience to be applied.*
- 3) We do not understand how this measure is aligned with the best mitigation practices and the best capital investments.*

Comment:

We recommend measures such as compost that can be established in a decentralized manner, which would allow the communities themselves, through micro-companies, to divert their organic waste. Puerto Rico has a very appropriate climate for this type of initiative that would benefit other sectors such as agriculture, taking advantage of the soil conditioners created and strengthening food security. Small-town composting facilities would in turn function as a way to dispose of vegetative material, which would benefit recovery activities after a weather event.

Establish municipal recycling facilities that integrate the components of 1) construction and demolition waste, 2) vegetative, organic and compost materials, 3) ferrous metals 4) additional electronic materials, electrical appliances, etc. it could be a complement that would help create a culture of recycling on the island.

To use his own words, compost facilities are part of an "environmental infrastructure" that we need to create.

Our company TAIS has a technique for recycling organic matter that we understand meets that definition.

Thank you very much,

*Ing. Carlos E. Pacheco**

PRDOH
Response:

Thank you for your comments. In reference to the inclusion of waste to energy, it was offered as one of several examples of alternative energy solutions provided in the Action Plan. A review of existing literature served as a resource to the planning process, and the reference to waste to energy was a recommendation provided by the US Department of Energy (US Department of Energy, Energy Resilience Solutions for the Puerto Rico Grid. Final Report June 2018. Accessed at: https://www.energy.gov/sites/prod/files/2018/06/f53/DOE%20Report_Energy%20Resilience%20Solutions%20for%20the%20PR%20Grid%20Final%20June%202018.pdf). When implemented responsibly, waste to energy is a valid material management practice. In fact, it remains in both the EPA waste management hierarchy and Puerto Rico's waste management hierarchy as established in Municipal Code of Puerto Rico, Law 107-2020. Reference to waste to energy has been removed from the Action Plan due to limited support for its implementation in Puerto Rico.

In addition, PRDOH acknowledges the significant role that renewable energy sources can play in improving the energy system's resilience and, in particular, the resilience of vulnerable populations in Puerto Rico. PRDOH also appreciates your suggestions and will take them into consideration during the future development of program guidelines, such as those which fall under HUD's Green Building Standards. You will find reference to many of the materials management practices you refer to in your comments in the Action Plan in the Materials Management sections.

080 Comment ID: 11/21/20_WP_NGO_Mercy Corps Puerto Rico_Karla Pena Romero(1)

Comment: *Mercy Corps Puerto Rico
CDBG MIT -DRAFT - ACTION PLAN – COMMENTS**

PRDOH
Response: Thank you for your comment.

081 Comment ID: 11/21/20_WP_NGO_Bosque Modelo de Puerto Rico_Carlos E. Pacheco P.E.(1)

Greetings:

On page 166 they present a table with the contributing factors of the vital needs for transportation. They mention that "municipally-owned roads in the tertiary systems have been the least resistant in recent disasters."

Comment: *In the response they mention the following mitigating factors:
1) Finance and develop an intelligent traffic management system.
2) Plans for the Port of the Americas
3) Community-based social media came together to remove debris quickly after the hurricanes. Such social systems prove to be supportive in response efforts.
4) Build the capacity of municipalities and regional associations to access mitigation assistance (emphasis added) through multiple grant programs. Increased stakeholder engagement to communicate a common understanding of risk and reco.*

We understand that these mitigating measures do not serve the needs of thousands of families within our service area.

Bosque Modelo presented a proposal to create a maintenance program for the road network that runs through our territory. The program recommends the creation of work brigades (Model Forest road workers) duly trained in maintenance of the taxiing surface, clearing vegetation, uncovering roads and bridges, planting stabilizer plants in areas prone to landslides and vegetation control as well as landscaping treatment.

We understand that this program would have a very positive impact on our mountainous region and would allow us to address the problem of displacement within the area by families in and at the same time provide sources of employment for people residing in the area.

We consider it important for this review that they include this project, which will address one of the contributing factors of the instability of the road network and will help create the necessary resilience for our communities.

Thank you very much,

*Ing. Carlos E. Pacheco Irizarry
President
Board of Trustees of the Model Forest of P.R.**

PRDOH
Response:

Thank you for sending your feedback, we acknowledge receipt of your comments and proposals. These comments have been integrated into the Public Comment Record. The executive summary was read live during the Ponencias del Pueblo Segment of the public hearing held on October 28, 2020. Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

082

Comment ID:

11/21/20_WP_NGO_Voluntariado de Ingenieros y Profesionales de Puerto Rico_Jesabel I Rivera De Jesus(1)

Comment:

*We appreciate this opportunity you give us to share our comments regarding the CDBG-MIT action plan. We await your response to the comments presented here. If you have any questions, please do not hesitate to contact us at info@ingenierospr.org**

PRDOH
Response:

Thank you for your comments. PRDOH recognizes and has identified, to HUD, the unmet need associated with the 2017 Hurricanes and 2020 Earthquakes, including in areas outside the declared area for the earthquakes. PRDOH's anticipates consideration of future allocations of CDBG-DR funding to specifically address the impacts of the 2020 Earthquakes. In view of the potential receipt of such funding, PRDOH defers consideration of your requests until the funding landscape has been clarified by HUD.

083 | Comment ID: 11/20/20_WP_NGO_Puerto Rico Solar & Energy Storage Association_Patrick James (PJ) Wilson(1)

Comment: *Please see attached comments in support of solar & storage aspects of this CDBG-MIT Proposed Draft Action Plan.*

PRDOH Response: Thank you for your comments. PRDOH will take your suggestions into consideration during the future development of program guidelines.

084 | Comment ID: 11/20/20_E_NGO_Programa del Estuario de la Bahía de San Juan (Estuario)_Brenda Torres(1)

Dear Secretary Fernández Trinchet,

Warm greetings from the San Juan Bay Estuary Program (Estuary). Thanks to the Puerto Rico Department of Housing (PRDOH) for the opportunity to provide comments regarding the draft Action Plan for the Block Grant Program for Mitigation Community Development.

Comment: *I have attached them.*

Cordially,

*Brenda Torres, MEM & LEED AP
Executive Director
San Juan Bay Estuary Program**

Thank you for your comments. Regarding climate change concerns, in addition to sea-level rise, climate sensitivity or climate change was considered as part of the severity of consequence for those hazards that have the potential to become more severe in force as a result of climate change, i.e. hurricane wind and storm surge, wildfires, flooding, sea-level rise, landslide, drought, severe storm, fog, lightning, tornado, wind, hail, and heat. These hazards and the risk associated with them were considered not only for the coast but also the inland areas. Further analysis of climate change and the induced effects of hazards in more detail across the archipelago is an excellent project candidate for the Risk and Asset Data Collection program.

PRDOH
Response:

You are correct. The High-Temperature Hazard Analysis considered the average number of days with temperatures above 95°F (35°C). Once air temperature reaches 95°F (35°C), perspiration becomes the most important manner of heat loss. Perspiration does not work if the water cannot evaporate (i.e. sweating in high relative humidity is less effective than in a dry climate). Because the hazard assessment was used to determine the risk to people and the built environment average annual days above 95°F (35°C) represented a better metric; however, an analysis of climate change and the induced effects to temperature and other hazards is an excellent project candidate for the Risk and Asset Data Collection program.

To consider Human-Caused Hazards, the best available data was analyzed for terrorist incidents (1970-2018) collected from the global terrorism database and transportation incidents resulting in chemical spills (2005-2019) collected from the Pipeline and Hazardous Materials Safety Administration. It is understood that the databases utilized are not comprehensive for Puerto Rico. A more detailed analysis of Human-Caused Hazards is an excellent project candidate for the Risk and Asset Data Collection program.

Regarding regional planning, we agree with your sentiments and encourage you to read the Planning and Capacity Building Program in the CDBG-MIT Action Plan which has been designed to strengthen the capacity of state agencies, municipalities, NGOs, and existing regional partnerships by assisting in the formation and/or strengthening and formalizing of existing, regional consortia to conduct mitigation enhancing activities.

Additionally, formal project proposals will be submitted to PRDOH and must demonstrate the project's promotion of long-term resilience and of planning at the community and regional levels and alignment with other planned capital improvements projects. Funding will be prioritized for projects that best provide these characteristics. All projects must be

submitted through the Mitigation Program application processes to qualify for funding based on federal and state eligibility criteria. These programs will launch once HUD approves the Action Plan and subsequent availability of funds to Housing, which will likely occur in the spring of 2021.

The Risk Assessment developed as part of the Action Plan can be utilized to identify areas and levels of risk across the island. This Assessment should be used as a planning tool when developing project proposals. Additional planning efforts may be required to develop good project proposals and demonstrate the project's ability to mitigate risk. Additional tools and guidance will be made available to eligible applicants to assist with the development of project proposals and provide more detail about project selection criteria after HUD approves the Action Plan. The Risk and Asset Data Collection Program is intended to assist Puerto Rico with the development of a more comprehensive database for Risk and Lifeline Assets.

We appreciate your interest and support of important planning initiatives that increase the data-centric resources for Puerto Rico and support the adaptive capacity of the Island.

085	Comment ID: 11/21/20_E_NGO_Comunidad San Isidro en Canóvanas_Belines Ramon Negros(1)
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Greetings,

I attach the comments of the San Isidro community in Canóvanas to the Puerto Rico Action Plan for the Block Grant Program for Community Mitigation Development (CDBG-MIT).

Comment:

Cordially,

--

Lcda. Belinés Ramos Negrón

PRDOH
Response:

Thank you for your submission. We acknowledge receipt of the Comunidad San Isidro en Canovanas proposal. It has become part of the public comment record. Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

086

Comment ID: 11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Marfín Peña_Mario Núñez - Mercado(1)

Comment:

Greetings, Mr. Secretary and team of the CDBG-MIT Program. Hoping they are well, we submit comments from the Corporación Proyecto ENLACE Caño Marfín Peña to the Action Plan of the CDBG-MIT funds.

I will be grateful if you confirm receipt of them. Good evening and have a good weekend.

PRDOH
Response:

Thank you for your submission. It has become part of the public comment record. Projects received during the public comment period are considered for planning purposes only and receipt of these projects does not constitute a commitment of funding. All projects must be submitted through the Mitigation Program application processes in order to qualify for funding under federal and state eligibility criteria. These programs will launch upon HUD's approval of the Action Plan and subsequent release of funds to PRDOH. We do not anticipate this to happen until Spring 2021 at the earliest.

Please note that by law, (codified in the HCDA as a note to 105(a)), the maximum amount of CDBG-MIT funds that may be contributed to a USACE project is \$250,000. Please also note that the Appropriations Act (Division B, Subdivision 1 of the Bipartisan Budget Act of 2018, Pub. L. 115-123, approved February 9, 2018) prohibits the use of CDBG-MIT funds for any activity reimbursable by, or for which funds are also made available by FEMA or USACE.

087

Comment ID: 11/25/20_E_NGO_Taller Salud, Inc._Jennifer De Jesús(1)

Comment:

Good afternoon:

In this email we include our Letter of Comments to the CDBG MIT Action Plan.

Sincerely

-

Jenifer De Jesús Soto

Community and Leadership Manager / Community and Leadership Manager

Thank you for your comments. In terms of Public Participation, please refer to the Stakeholder Engagement Report for detailed information regarding the outreach and engagements efforts carried out throughout the Action Plan development process. Public hearings #4 and #5 aired forty (40) Ponencias del Pueblo giving the citizens of Puerto Rico a chance for their voices to be heard. The public comment period for the Action Plan was extended to sixty (60) days.

When determining risk that considers changing environmental conditions, as part of the Risk Assessment, and in addition to the Hazard Analysis that considers climate induced sea level rise, climate sensitivity influences the severity of consequence for those hazards that have the potential to become more severe in force as a result of climate change, i.e. hurricane wind and storm surge, wildfires, flooding, sea level rise, landslide, drought, severe storm, fog, lightning, tornado, wind, hail, and heat. Considering the Risk Assessment, the product of severity of consequence, vulnerability, and threat yields risk and higher severity of consequence is often associated with higher risk. In the Infrastructure Mitigation Program, projects that mitigate risk from hazards, including those hazards that are climate sensitive, will be prioritized based on the magnitude of mitigation. In addition to the mitigation of risk, and per the 84 FR 45850, Covered Projects must reflect changing environmental conditions with risk management tools.

PRDOH
Response:

Regarding vulnerable populations, PRDOH utilizes the Social Vulnerability Index (SoVI) in our analysis which considers twenty-nine (29) variables known to influence the ability of social groups and communities to prepare for, respond to, and recover from disasters. There are three unique indicators specifically tied to female characteristics to consider the percent of female citizens within the population, female head of households, and percent of female participation in the labor force.

Please refer to Procurement Section at: <https://cdbg-dr.pr.gov/en/procurement-and-nofa/> that includes HUD-approved procurement policies and Section 3. It is important to highlight that the DR and MIT Programs have an obligation to promote minority- and women-owned business enterprises (MWBE). In fact, these are given an additional score in the selection process for goods and services proposals for CDBG-DR funds. All the information contained there will also apply to CDBG-MIT.

Multi-family housing projects are being funded through the \$1 billion match for the FEMA Hazard Mitigation Grant Program (HMGP). The Housing Mitigation Program will offer eligible, individual flood-and-landslide threatened homeowners with the option to opt in for voluntary relocation or investigate the feasibility of elevation of their home above the FEMA base flood elevation. Homeowners seeking relocation must provide a public deed to prove ownership. Homeowners seeking elevation will eventually need to provide proof of ownership. Interested homeowners are encouraged to consult with the CDBG-DR Title Clearance Program, designed to provide assistance for

those citizens that cannot provide proof of ownership and are eligible for other assistance.

PRDOH has our communities in mind. We understand that impacts caused by displacement in this type of initiatives. PRDOH, believes that our participation program provides tools to invest in communities and avoid at maximum possible any disruption to the social, cultural and identity of the affected communities. Every project funded in part or in full by CDBG-MIT funds, and all activities related to that project, are subject to the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended and section 104(d) of the Housing and Community Development Act of 1974 (HCDA), except where waivers or alternative requirements have been provided by HUD.

III. Ponencias del Pueblo

Through a robust public information campaign, individuals and organizations were encouraged to submit three-minute videos or executive summaries presenting their mitigation projects and proposals. Acceptable videos were aired during the fourth (4th) and fifth (5th) public hearings broadcasted on WIPR.

The public was provided with a helpful guide on how to record a video for television broadcast using personal devices (cell phone, tablet, webcam, etc.), instructions on how to submit a video, and on acceptable language and video content.

The *Ponencias del Pueblo* was available to all entities and citizens that had an interest in submitting a proposal for CDBG-MIT.

The aired *Ponencias del Pueblo* from the 4th and 5th Public Hearings were listed in the section below in the order in which they were broadcasted. In addition, the minute in which the video or proposal appears was provided to facilitate its viewing. Please use the following links to access the *Ponencias del Pueblo*:

- 4th Public Hearing: <https://youtu.be/w2tGpR8xA1k>
- 5th Public Hearing: <https://www.youtube.com/watch?v=XKvdRqVfS4E>.

4th Public Hearing

001 Submitted by: Hon. María "Mayita" Meléndez Altieri

Related to: *Municipio de Ponce*

Timestamp: *Starts on Minute 28:59*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

002 Submitted by: Roy Colón Miguel

Related to: *A19 LLC*

Timestamp: *Starts on Minute 33:18*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

003 Submitted by: Elena Pagán

Related to:

- o *Sector Palo Seco de Toa Baja y Cataño,*
- o *Casco Urbano de Río Piedras en San Juan,*
- o *Urbanización University Gardens, San Juan*
- o *Carretera 102, Frente a Urbanización San José y Guanajibo Homes, orilla de la playa, Mayaguez*

Timestamp: *Starts on Minute 36:20*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

004 Submitted by: Lcda. María D. Fernós López-Cepero

Related to: *INTER MUJERES Puerto Rico*

Timestamp: *Starts on Minute 39:09*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

005 Submitted by: Mario Nuñez Mercado

Related to: *Corporación Proyecto Enlace Caño Martín Peña*

Timestamp: *Starts on Minute 47:05*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

006 Submitted by: Jorge González García

Related to: *Steam & Combustion Technology, Inc.*

Timestamp: *Starts on Minute 51:40*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

007 Submitted by: Orlando López

Related to: *Finca ubicada en San Sebastián*

Timestamp: *Starts on Minute 55:34*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

5th Public Hearing

001 Submitted by: Kathleen Zorana Rodríguez

Related to: *Para La Naturaleza*

Timestamp: *Starts on Minute 4:02*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

002 Submitted by: Hon. Javier García Pérez

Related to: *Municipio de Aguas Buenas*

Timestamp: *Starts on Minute 6:58*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

003 Submitted by: Emily Campos Soto

Related to: *Hospital San Carlos Borromeo*

Timestamp: *Starts on Minute 10:57*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

004 Submitted by: Maritère Padilla Rodríguez

Related to: *Hispanic Federation*

Timestamp: *Starts on Minute 13:56*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

005 Submitted by: Luis A. González-Vargas

Related to: Museo de Aguadilla y del Caribe

Timestamp: Starts on Minute 16:41

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

006 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Zuleyma

Timestamp: Starts on Minute 21:15

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

007 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Sylvia

Timestamp: Starts on Minute 22:03

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

008 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Joan

Timestamp: Starts on Minute 24:55

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

009 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Nelson

Timestamp: Starts on Minute 27:16

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

010 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Dulce

Timestamp: Starts on Minute 28:57

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

011 Submitted by: Mujeres de Islas, Inc.

Related to: Ciudadano / Residente de Culebra | Rita

Timestamp: Starts on Minute 30:05

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

012 Submitted by: Lcda. Sarah J. Delgado

Related to: Junta de Fiduciarios del Fideicomiso de la Tierra del Caño Martín Peña

Timestamp: Starts on Minute 31:09

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

013 Submitted by: Edwin García Feliciano

Related to: *Oficina del Procurador del Ciudadano (Ombudsman)*

Timestamp: *Starts on Minute 37:12*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

014 Submitted by: Pedro F. Barez Clavell

Related to: *Hospital Damas*

Timestamp: *Starts on Minute 40:12*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

015 Submitted by: Esther Caro

Related to: *Asociación Mayagüezana de Personas con Impedimentos, Inc.*

Timestamp: *Starts on Minute 43:13*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

016 Submitted by: Lcda. Belinés Ramos Negrón

Related to: *Las Villas en el barrio San Isidro, Canóvanas*

Timestamp: *Starts on Minute 46:24*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

017 Submitted by: Francine Sánchez Marcano

Related to: *Compañía para el Desarrollo Integral de la Península de Cantera*

Timestamp: *Starts on Minute 49:37*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

018 Submitted by: Ing. Carlos Pacheco

Related to: *Junta Fiduciarios Bosque Modelo de Puerto Rico*

Timestamp: *Starts on Minute 53:29*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

019 Submitted by: Dr. Ramón L. Álvarez Feliciano

Related to: *Albergue Olímpico*

Timestamp: *Starts on Minute 57:35*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

020 Submitted by: Dr. Grayson C. Brown

Related to: *Unidad de Control de Vectores de Puerto Rico*

Timestamp: *Starts on Minute 1:00:34*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

021 Submitted by: Israel Collazo

Related to: *Comité Unidos al Recate del Barrio Mameyes, Inc.*

Timestamp: *Starts on Minute 1:03:55*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

022 Submitted by: Nayda Bobonis Cabrera

Related to: *PRODEV*

Timestamp: *Starts on Minute 1:07:35*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

023 Submitted by: Luis Ariel González, M.S.E.E.

Related to: *Hospital Comunitario Buen Samaritano*

Timestamp: *Starts on Minute 1:10:37*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

024 Submitted by: Joel Rodríguez, CPA

Related to: *Expert Accounting Group | Proyecto 1 – 2 – 3*

Timestamp: *Starts on Minute 1:13:37*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

025 Submitted by: María del Carmen Rivera

Related to: *Representante de la Comunidad Parcelas Falú*

Timestamp: *Starts on Minute 1:16:00*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

026 Submitted by: Lcdo. Pedro F. Barez Clavell

Related to: *Fundación Damas*

Timestamp: *Starts on Minute 1:18:55*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

027 Submitted by: Ernesto Valle Quintana

Related to: *E&F Tech College*

Timestamp: *Starts on Minute 1:21:48*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

028 Submitted by: Brenda Torres Barreto

Related to: *Programa del Estuario de la Bahía de San Juan*

Timestamp: *Starts on Minute 1:24:53*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

029 Submitted by: Lucy M. Cruz Rivera

Related to: *Grupo de las Ocho Comunidades Aledañas al Caño Martín Peña, Inc.*

Timestamp: *Starts on Minute 1:28:24*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

030 Submitted by: Hon. Alfredo Alejandro Carrión

Related to: *Municipio de Juncos*

Timestamp: *Starts on Minute 1:31:56*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

031 Submitted by: Ángel Marrero Ortiz

Related to: *Municipio de Barranquitas*

Timestamp: *Starts on Minute 1:36:42*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

032 Submitted by: Nayda Bobonis Cabrera

Related to: *FURIA, Inc.*

Timestamp: *Starts on Minute 1:39:58*

PRDOH Response: Thank you for your proposal. It is part of the public hearing record.

033 Submitted by: Carlos González Hernández

Related to: *Productora Ángeles del Fin, PADF*

Timestamp: *Starts on Minute 1:43:03*

PRDOH
Response: Thank you for your proposal. It is part of the public hearing record.

Ponencias del Pueblo – Not Aired

001 Submitted by: Carmen L. López - President

Related to: *Nuestro Corazón para su Hogar*

PRDOH Response: Thank you for your proposal. It is part of the public comment record.

002 Submitted by: Lcdo. Armando Rodríguez-Benítez, MHA, Presidente

Related to: *Hospitales HIMA San Pablo*

PRDOH Response: Thank you for your proposal. It is part of the public comment record.

003 Submitted by: Barrio Eléctrico

Related to: *Learning from María Power Blackout - Community-Powered Distributed Residential Solar as a Mitigation Strategy*

PRDOH Response: Thank you for your proposal. It is part of the public comment record.

IV. Additional Projects List

In May 2020, PRDOH released the Proposed Mitigation Projects Log template to federal, state, municipal, and NGO stakeholders to request a baseline understanding of their mitigation needs. The projects submitted before the November 5th deadline were included in the Appendix D.

Therefore, the projects listed in this section represent the projects mentioned in the CDBG-MIT Public Comments submitted after the deadline mentioned above. Each project includes the following:

- Comment ID
- Categories Related to the Projects
- Project Cost (if mentioned)
- Brief Project Description

Additional Projects Summary

Comment ID	Category	Project Cost	Project Description
11/20/20_E_NGO_Ridge to Reefs and Mujeres de Islas_Phal Mantha(1)	Economic Development Infrastructure	\$375,000.00	
11/20/20_E_NGO_Comunidad San Isidro en Canóvanas_Belines Ramon Negros(1)	Economic Development Infrastructure	\$11,330,616.00	

Additional Projects Summary

Comment ID	Category	Project Cost	Project Description
<p>11/14/20_WP_NGO_COALICIÓN COMUNITARIA LOÍZA AHORA_Eddies A. Rivera(1)</p>	<p>Infrastructure</p>		<p>1) PERMANENT CHANNELIZATION OF THE HERRERA RIVER MOUTH AND THE CLEANING AND DREDGING OF ITS CLOGGED RIVER MOUTH THAT RUNS JUST BEHIND HIGHLY POPULATED SECTORS IN THE MIDDLE-UPPER AND LOW-MIDDLE BARRIOS.</p> <p>2) DREDGING, CHANNELIZATION AND CLEANING OF THE SAN LUIS CANAL AND OTHER SEDIMENTED CANALS AND WITHOUT ADEQUATE MAINTENANCE FOR MORE 50 YEARS TO THE SOUTH AND WEST OF THE LOIZA TERRITORY.</p> <p>3) THE CONSTRUCTION OF A CENTRAL SEWAGE IN A MIDDLE SECTION OF PR-187 STATE ROAD FROM THE VIEQUEZ PLOTS IN MIDDLE HIGH TO THE FRONT OF THE MUNICIPAL CEMETERY AT THE ENTRANCE OF THE CORECAMAR CAMP IN MEDIANIA BAJA, INCLUDING A STORM WATER PUMP STATION TO THE SEA TO CONTROL, HANDLE AND DISPOSE OF WATER, TRAVELING AT HIGH VELOCITIES, WHICH TEND TO STAGNATES AND ACCUMULATE AFTER RAIN EVENTS. IN ADDITION, THE PROJECT INCLUDES A SERIES OF 4 STORM WATER PUMP STATIONS EQUIPPED WITH HIGH WATER MONITORING SENSORS AND STORM WATER DRAIN IMPROVEMENTS IN COMMUNITIES ALONG STATE ROAD PR 187 TO PREVENT RUNOFF FROM THE HIGHWAY FROM ENTERING THE COMMUNITY.</p> <p>4) A PROJECT FOR A DYKE IN BARRIO LAS CUEVAS PREVIOUSLY PROPOSED AT A PLANNING BOARD PUBLIC HEARING IN JUNE 2007.</p> <p>5) PROJECTS TO MITIGATE POSSIBLE FLOODS IN THE CUEVAS AREA URBAN AREA AND OTHER SURROUNDING AREAS, THROUGHOUT THE LOIZA CITY CENTER AND SURROUNDING AREAS, AND AREAS OF THE TORRECILLA BAJA DE LOÍZA NEIGHBORHOOD TO THE WEST OF THE LOIZA MUNICIPAL TERRITORY.</p> <p>6) DREDGING, CHANNELIZATION, AND CLEANING OF LAGOONS, CHANNELS, AND CAÑOS, INCLUDING THE CHANNEL THAT LEADS TO THE ISLAND OF JUAN PEREZ, IN THE PIÑONES STATE FOREST.</p> <p>7) DRAINAGE DITCH IMPROVMENTS ALONG PR 187 ROAD IN FRONT OF THE VACIA TALEGA BEACH TO PREVENT FLOOD CLOSURES OF THIS SECTION OF PR 187 IS THE ONLY INGRESS/EGRESS ROUTE FOR THE VILLAGE OF LOÍZA VIA ISLA VERDE AND CANGREJO FROM SAN JUAN.</p>

Additional Projects Summary

Comment ID	Category	Project Cost	Project Description
11/02/20_WP_NGO_EcoExploratorio, Inc._Ada Monzon(1)	Economic Development Infrastructure	\$16,000,000.00	<p>EcoExploratorio: Resilience Institute of Puerto Rico</p> <ul style="list-style-type: none"> • It will focus on three areas: 1) Economic Advocacy; 2) Building a Resilient Infrastructure; and 3) Education and Training Center to Address Risk Illiteracy. • Hub for Hazard Mitigation and Resilience in the Caribbean • It will provide a wide range of programs that will empower our current and future entrepreneurs in jobs and careers where they can innovate, thrive and create new opportunities by developing their skills. This in turn, will lead to a multiplier effect, that will lead to the creation of 5,000 (direct and indirect) new jobs. <p>Administrative and legal expenses \$200,000 Architectural and engineering fees \$1,592,000 Other architectural and engineering fees \$80,000 Project inspection fees \$180,000 Site work \$930,583 Demolition and removal \$677,848 Construction \$11,668,268 Equipment \$1,250,000 Miscellaneous (Solar panels) \$300,000 Contingencies \$3,038,165 Other \$83,136</p>
11/20/20_Kathleen Rodriguez_Para_La_Naturaleza	Infrastructure	Not defined.	<p>1) Projects that generate community resilience plans and studies to help understand the functionality and current conditions of Puerto Rico's ecosystems that facilitate effective restorations in accordance with the Land Use Plan. For example, projects such as the development of hydrological studies for the Barrio Bajura wetland in Isabela, which help understand how to reduce threats to human life and public infrastructure.</p> <p>2) Green infrastructure projects, including reforestation to promote soil stabilization, and create riparian corridors and improve water quality. Projects examples include: the stabilization of soils in the area of the Old Aqueduct of the Río Piedras, the creation of a riparian corridor in the Fajardo River and the restoration of the Jobos wetland in Isabela.</p> <p>3) The incorporation of green infrastructure projects in coastal areas, including the restoration of dunes, forests and wetlands in places such as Cabezas de San Juan, Ceiba and the PR-250 in Culebra, that help protect the coastal environment and communities.</p> <p>4) Projects that protect human life by providing housing resistant to impacts from future disasters, such as the relocation of more than 20 families in</p>

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			the community of El Negro, in the Inés María Mendoza nature reserve in Yabucoa.
11/05/20_WP_NGO_INSTITUTO PRE-VOCACIONAL E INDUSTRIAL DE PR INC._Nilsa LOpez Rivera(1)	General Admin	Not defined.	Project to offer community alternatives for the vulnerable population of Arecibo through activities in reinforcement and stability strategies.
11/05/20_WP_ Corporacion Desarrollo Economico, Vivienda y Salud (CODEVYS)_Nilsa LOpez Rivera(1)	General Admin	Not defined.	Development of a shelter that meets desirable expectations so that a family can be sheltered and protected with dignity.
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)	Housing	\$37,224,000.00	Home Construction: The cost estimated by our experts for this project ranges around \$ 72,000 per unit of housing for a total cost of \$ 37,224,000 million from the CDBG-MIT program.
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)	Housing	\$13,840,000.00	Rehabilitation and reconstruction of houses to seismic code: The total cost of this project is \$ 13,840,000 million from the CDBGMIT program.
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)		\$12,000,000.00	Construction of breakwaters on the banks of the Centro Urbano communities Traditional, Guaypao and Playa Santa.According to our preliminary studies, the average cost in the industry for this type ofbreakwater that includes the natural component of coral structures, oscillates around the \$ 1,500 per linear foot. The total impact area cost of the 8,000 linear feet of shoreline expected amounts to about \$ 12,000,000 from the CDBG-MIT Program.
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)	Infrastructure	\$5,220,000.00	Construction of a multiple service center and shelters. The estimated cost for this project is about \$ 5.22 billion, coming from funds from the CDBG-MIT program for which it qualifies.
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)	Infrastructure	\$15,784,000.00	Acquisition of 107 properties for the establishment of a "buffer zone" in the maritime-land zone. The total cost of this project ranges from about \$ 15,784,000.

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11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)		\$32,361,441.00	<p>Education</p> <p>The total estimated cost for the 3 campuses ranges around \$ 32,361,441.</p> <p>Guánica is the only population throughout the United States without adequate school facilities for education of our children and youth. Due to the earthquakes, the six (6) schools that operated in the city of Guánica were total loss, leaving a population of 1,860 devoid of facilities students at all educational levels. Our experts and work team have done estimates of the construction costs of said facilities, for which we have identified and we are in the process of acquiring the land for its construction, in accordance with a comprehensive plan of urban rehabilitation that we are in full design. Preliminarily, the costs associated with the 3 schools are as follows, in proportion to each educational level and its respective population:</p> <p>A. Elementary School - \$ 9,129,075 B. Middle School - \$ 9,641,783 C. High School - \$ 13,620,583</p>
11/06/20_E_MGA_Municipio de Guánica_José Rodríguez - Asesor en Planificación(1)	Economic Development	\$116,429,441.00	<p>EFFECT ON THE ECONOMY</p> <p>The projects presented total about \$ 116,429,441. Each and every one of them have a essential impact for the recovery and resilience of our city. In addition, the effect on production emanating from the jobs created is 1,740 per million dollars, which represents a multiplier effect of about \$ 175 million in our economy. Thus, Each project can not only measure its impact on the depressed local and regional economy, but also the effect this has on job creation derived from such investment. In the case of construction, it is observed that the production multiplier is 1.9601, which in its construction would generate about 5,134 jobs.</p>
11/21/20_E_NGO_FURIA and PRODEV_Nayda Bobonis Cabrera(1)	Infrastructure	Not defined	<p>Río Blanco Community in Naguabo:</p> <p>1) After the passage of Hurricane Maria, the community bridge, recognized as historical heritage, was considerably affected, for which its imminent demolition was announced. This bridge was the main connector to the center of town, highways, hospitals, ambulances and schools, but the community was not informed of the process until the subsequent placement of the signs indicating what would happen there. The construction of a concrete bridge to replace the bridge is currently underway. There is a temporary bridge, but the community was without its main road for seven months and they used an alternative road, called the Cuesta del Pilon, unsafe due to landslides and availability of only one lane.</p>

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			<p>Add to the bridge project a connector or elevated to the highway to eliminate the problem of passage during heavy rains and the flooding of the river. This was more than seven years ago, more in August 2020, Governor Wanda Vasquez visited Naguabo, saw the situation and accompanied by Mr. Alex Amparo, FEMA Coordinator, and proposed the search for mitigation funds and FEMA to make a connector that will end the problem of years. This would be one of the projects that the community views as a priority to serve the nearly 400 families who are affected and cut off from this situation.</p> <p>2) This situation joins a second problem, the fear about the safety of a water reservoir managed by the Aqueduct and Sewer Authority (AAA) that exists in the neighborhood and supplies water to the Region. This reservoir presents an imminent danger, considering that in the summer of last year they were informed that during Hurricane Maria the earth wall weakened and they were working to reinforce the area where the reservoir wall displaced. without specifying the magnitude of the damage or its safety. Currently, it does not have alert systems to the surrounding communities in the event of a possible rupture and there is a need for eviction.</p> <p>3) Part of the safety of the community could be addressed through the use of a disused school near the community, transforming it into a first response center. The community school was closed a year before Hurricane Marr a, a school whose challenge was Agricultural Education, and which was used as a shelter when emergencies such as storms and hurricanes occurred. It had been envisioned that the COSSMA Clinic (Centers 330) would provide services to the community from there, but it will not be used for this despite having opened in Rio Blanco and many people changed their medical group as they will be able to reach the clinic on foot .</p> <p>The community wants to obtain the School, which is in the hands of the municipality, since there are many classrooms and a lot of land to turn it into a Resilience Center and thus be able to function as a first response to emergencies in addition to being able to offer other services to our community. This can be enabled as a community center, serving as a shelter AND a care center to mitigate risks in emergencies. This would help with the situation that the community is distant from the town center and municipal refuge.</p>

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<p>11/21/20_E_NGO_FURIA and PRODEV_Nayda Bobonis Cabrera(1)</p>	<p>Infrastructure Transportation</p>	<p>Not defined</p>	<p>Vieques and Culebra</p> <p>Our municipal islands have suffered from transportation problems for years, as well as a lack of access to adequate health facilities, necessary for their sustainability and resilience. It is unacceptable that, to date, three years after Hurricanes Irma and María, the Nena Islands do not have accessible and quality health services, as well as a stable and effective transportation system. It is even more unusual that due to the privatization of maritime transportation, among other things, both islands lost communication between them, directly affecting even more the possibility of exchanges and support between them, including the economic activity that sustains them, tourism.</p> <p>Among some of the projects that our island municipalities claim to improve their well-being and quality of life, in addition to attention to transportation and the construction or rehabilitation of a health center, is the construction of a "safe room", which secure a shelter that meets all needs after a disaster. It is important to provide electricity services with renewable solar energy, improve water collection with cisterns in each house and community collection systems, as well as develop agroecological planting, including home and community gardens.</p> <p>The agonizing transportation problem, as well as the lack of access to health care, affects all areas of their lives and greatly afflicts the residents of Vieques and Culebra. It is essential to respond promptly and secure mitigation funds for these projects.</p>

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11/21/20_E_NGO_FURIA and PRODEV_Nayda Bobonis Cabrera(1)	Infrastructure	Not defined	<p>Coastal Communities</p> <p>Climate change issues have considerably affected the coasts of our Island. Over time, the sea has been reclaiming spaces where many of our communities have lived for decades. This is partly due to the fact that strategies have not been developed to address precisely this problem in order to prevent the consequences of this climate change and its impact on the environment from displacing our communities.</p> <p>Among the 48 coastal towns, we share three specific examples where it is essential to work mitigation processes to ensure the conservation of spaces and permanence of their residents. In the case of Guayanilla, after hurricanes Irma and María, there has been the phenomenon that the sea enters the community where this did not occur, happening at all times and not only when there is a process of rain or storm surge . This is mainly due to a serious erosion process in the past years.</p> <p>Also concerned about this are the residents of La Perla, who have lost their shoreline and the reefs no longer protect them as they used to. They fear for their lives every time an atmospheric phenomenon approaches, because in emergencies mobilization can be a challenge. The same is the case with the Parcelas Suarez community in Loíza, who today lose their homes due to lack of action on mitigation projects to stop coastal erosion.</p> <p>Something similar happens at Fortuna Playa in Luquillo, where, according to the leadership, 40 feet of ground was lost in just four months, from November 2019 to February this year. Residents and leaders have been very vigilant as they have been identifying the problem of erosion and the damage to the environment for decades. They have denounced the need to protect our coasts as a place by avoiding excessive construction on them. They are currently denouncing the sale of land for development, a process that could irreversibly deteriorate the deplorable conditions of the community and the residents that reside there.</p> <p>A comprehensive and effective mitigation plan is essential to ensure the well-being of our people on the coasts of Puerto Rico. This has not been a government priority nor has it been adequately considered in emergency plans. Mitigation funds are an important resource to address the situation, and allocating funds to address the problems of coastal communities should be seriously considered.</p>

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11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)	Infrastructure	\$27,000,000.00	<p>Ecosystem Restoration of the Caño Martín Peña</p> <ol style="list-style-type: none"> 1. Reduce flooding in surrounding communities, with differences of up to one foot in the east side of the canal, substantially improving quality of life (in 2012, 70% of the area's residents commented that their streets were flooded during rainy events, which is 39% more than those affected in 2002); 2. Improve the health of district residents, 31% of which suffer from gastrointestinal problems related to water quality, compared to 20% at the island level. The Enlace Corporation estimates that \$21M could be saved in medical expenses once the project is completed; 3. Improve by 60% the quality of natural waters in the San Juan Bay Estuary, around which 600,000 Puerto Ricans live; 4. Allow for channel navigation, increasing the feasibility and viability of economic development in the area; 5. Mitigate risk to critical infrastructure such as the Port of San Juan, the busiest port in the Caribbean and the entry point for 80% of the goods consumed on the island; 6. Reduce discharges affecting the operations of the Luis Muñoz Marín International Airport, the island's main entry and exit point with approximately 9 million passengers per year, thanks to the added depth of the San José Lagoon; and 7. Improve connectivity within the San Juan Bay Estuary by 61%, restore water oxygenation levels, create 6,678 habitat units, increase biodiversity, and establish a fishing activity node for the Caribbean
11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)	Infrastructure	\$15,000,000.00	<p>Rexach Trunk Sewer Relocation: \$15M. This project has a completed design and the rights of way necessary (ROW) for construction. It will enable critical stormwater management and sewer infrastructure interventions in the neighborhoods north of the Caño.</p>
11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)	Infrastructure	\$38,000,000.00	<p>Paseo del Caño Sur & Infrastructure in Israel-Bitumul North Phase I: \$38M. This project has a completed design and ROW for construction. It includes stormwater and sanitary sewer, potable water and transportation infrastructure, and will incorporate green infrastructure strategies to maximize stormwater management as critical hazard mitigation measures needed to reduce flood risks and public health and safety risks in the communities south of the Caño</p>
11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)	Infrastructure	\$88,000,000.00	<p>Paseo del Caño Norte & Infrastructure in Buena Vista Santurce Phase I & II: \$88M. This project has a completed conceptual design. It includes stormwater and sanitary sewer, potable water and transportation infrastructure, and will incorporate green infrastructure strategies to maximize stormwater management as critical hazard mitigation measures needed to reduce flood risks</p>

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			and public health and safety risks in the communities south of the Caño.
11/20/20_WP_NGO_San Juan Bay Estuary Program (Urban Waters)_Ingrid M. Vila Biaggi(1)	Housing	\$48,000,000.00	Resilient Housing: \$48.8M. Construction of decent, safe and sanitary housing incorporating FEMA compliant elevation standards, where necessary. These new housing include multifamily development projects and single-family units developed using existing designs by Fernando Abruña (pro bono), ERERAS Architects, AlvarezDíaz & Villalón (pro bono) and Rossi Lugo Architects, adapted for each lot. Although most lots belong to the Fideicomiso, funds will also be used to acquire and redevelop privately owned vacant lots or those with damaged structures. New housing also included multifamily development on Fideicomiso f. Real Estate acquisitions and relocations either to move families from severely hurricane affected homes or from relocation areas, as required by the Comprehensive Development Plan, to allow for infrastructure measures.
11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Martín Peña_Mario Núñez - Mercado(1)	Infrastructure	\$92,000,000.00	<ul style="list-style-type: none"> • Paseo del Cano Sur Israel-Bitumul, \$92 million (\$68 million for construction and \$24 million for associated housing, including acquisition, relocation and demolition): This project will increase capacity and resilience of stormwater, sanitary sewer system (SSS), potable water & transportation infrastructure (Paseo del Cano) to mitigate flood-risks in communities located at the south side of the District. It will reduce the frequency and/or severity of flooding & flood damage. It will also reduce the volume of raw sewage discharges & combined sewer overflow, providing protection in flood events, addressing serious flooding & public health issues for over 1,500 homes in the Israel-Bitumul community, increasing conveyance in the San Juan Bay Estuary & enabling the dredging of the Cano Martín Peña, improving natural drainage functions.
11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Martín Peña_Mario Núñez - Mercado(1)	Infrastructure	\$204,000,000.00	<ul style="list-style-type: none"> • Paseo del Cano Norte Buena Vista Santurce, Barrio Obrero Marina & Barrio Obrero San Ciprian, \$204 million (\$125 million for construction and \$79 million for associated housing, including acquisition, relocation and demolition): This project will increase capacity & resilience of SSS & stormwater infrastructure to mitigate flood-risks in communities located at the north side of the District. It will reduce the frequency or severity of flooding & flood damage, volume of raw sewage discharges & combined sewer overflow, & manage 456 acres of watershed sub-basin, providing flood-protection & addressing public health issues for over 5,121 residents in the northern region of the Cano, increasing conveyance of the San Juan Bay Estuary & enabling the dredging of the Cano, improving natural drainage functions.

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11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Martín Peña_Mario Núñez - Mercado(1)	Housing	\$134,000,000.00	<ul style="list-style-type: none"> Resilient Housing, \$134 million: Construction of 328 decent, safe, and sanitary housing units, in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, incorporating FEMA compliant elevation standards, where necessary. These housing projects will be primarily offered to families affected by relocation processes within the District. This includes \$20 million to incorporate solar energy strategies.
11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Martín Peña_Mario Núñez - Mercado(1)	Infrastructure	\$110,000,000.00	<p>Paseo de/ Cano Sur Buena Vista Hato Rey, Las Monjas and Parada 27, \$110 million (\$77 million for construction and \$33 million for associated housing, including acquisition, relocation and demolition): This project will increase capacity & resilience of SSS & stormwater infrastructure to mitigate flood-risks in communities located at the south side of the District. It will reduce the frequency and/or severity of flooding & flood damage, volume of raw sewage discharges & combined sewer overflow, & manage 129 acres of watershed sub-basin, providing protection from flood events, and addressing serious flooding and public health issues for over 3,730 residents in the southern region of the Cano.</p>
11/25/20_E_NGO_Corporación Proyecto ENLACE Caño Martín Peña_Mario Núñez - Mercado(1)	Planning	\$5,000,000.00	<p>Whole Community Planning Initiative (Cost/Benefit and Return of Investment Analysis), \$0.5M. Critical to gauge the effectiveness and efficiency of the proposed investment; document the relationship between the aforementioned projects to the disaster; and, complement available risk reduction data, in preparation for mitigation funds.</p>