



May 4, 2018

Hon. Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW Room 10148
Washington D.C. 20410-1000

Fernando Gil Enseñat, Esq.
Secretary
Departamento de la Vivienda
Apartado 363188
San Juan, PR 00936-3188

RE: CDBG-DR- EXTENSION OF COMMENT PERIOD AND PUBLIC HEARINGS

Dear Secretaries Carson and Gil Enseñat:

We, as leaders for low and moderate-income communities, advocates, grassroots organizations and access to justice community members in Puerto Rico and the United States, request the U.S. Department of Housing and Urban Development (HUD) to grant an extension to the public commentary period for the Puerto Rico Draft Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program, scheduled to be made public on May 9th, 2018. We also request that HUD ensure that public hearings are held as an integral part of the public participation component sufficiently prior to the submission of the Puerto Rico Action Plan to allow thoughtful consideration of the hearing record.

As per the published schedule, the government of Puerto Rico must submit an Action Plan no later than May 10th. This plan must detail their strategy and justifications for the allocation of \$1.5 billion in CDBG-DR funds to aid in the long term recovery from Hurricane Maria. As advocates and community leaders, we are concerned over the lack of effective public participation in the hearings conducted in March and in which several proposals for the allocations were received. Not only was the notice for these hearings inadequate but the participation consisted mainly of municipalities and government agencies. Many of the proposals presented by these public officials include the

displacement of historically vulnerable communities who have been unable to access any information around CDBG-DR processes or the projected plans.

The importance of CDBG-DR funds for long-term recovery, the lack of access to information and the inadequacy of the data that supports the aforementioned proposals make it urgent for these communities to participate, provide alternate data and have the chance to defend their right to adequate housing and democratic participation. Too often, money intended for low and moderate income people's housing has been diverted to uses other than fair housing compliance. We share a responsibility to ensure that available resources are used fairly, efficiently, and effectively, with a level of transparency and accountability that provides the public with confidence on public spending and post-recovery planning.

Taking all of these facts into consideration, we request:

- a. A 30-day extension of the public comment period on the Draft Action Plan. This would provide communities and grassroots organizations with sufficient time to consider the Draft Plan, effectively assess their infrastructure and housing needs and present commentaries on the Draft plan. This may also require a waiver and extension of the evaluation period HUD has to evaluate and approve the Action Plan.
- b. The celebration of public hearings as part of the Draft Plan comment period. These hearings must be evenly distributed through geographical areas and properly notified. Notices in both Spanish and English should be published. Public participation is a requirement for the allocation of these funds and the possibility of new public hearings can provide HUD, the local Department of Housing and other stakeholders with a better perspective of the unmet needs of the communities.
- c. An official translation of the Allocation Notice and other CDBG-DR funds information into Spanish, in order to ensure that information is effectively communicated to inhabitants of Puerto Rico.

All of these requests would lead to a more inclusive and participative process and outcome, where the true unmet needs of underrepresented communities are taken into account. The right to housing is a human right, fundamental to guarantee human dignity and fair conditions of life. Efforts to rebuild Puerto Rico in the aftermath of Hurricanes Irma and Maria require the joint collaboration of different sectors and such cooperation is only possible on the grounds of participation and access to information. The requested comment period extension and the conducting of public hearings would

provide communities and their leaders an active voice and efficient participation in their future. It is in the best interest of our communities and organizations that we announce our disposition to collaborate and facilitate processes leading to promote and ensure such participation.

Cordially,

Ariadna Godreau-Aubert, Esq.
Mariel Quiñones Mundo, Esq.
Ayuda Legal Huracán María

Amárilis Pagán Jiménez, Esq.
Proyecto Matria

María L. Jiménez, Esq.
**Director- Legal Aid Clinic,
University of Puerto Rico Law
School**

Natasha Lycia Ora Bannan, Esq.
LatinoJustice PRLDEF

Jose Joaquin Mulinelli-Rodriguez
COAI, Inc.

Marina Moscoso Arabía
Casa Taft 169

Aracelis Cruz Suárez, Esq.
**Pro Bono- Law School, Pontificia
Universidad Católica de Ponce**

David Carrasquillo Medrano, PPL
**Sociedad Puertorriqueña de
Planificación**

Rafael Cortés Dapena, Esq.
**President- Red de Fundaciones de
Puerto Rico**

Modesta Irizarry
Community Leader - Loíza

Francisco Rodríguez
Coalición de Coaliciones

Adam M. Gordon, Esq.
**Associate Director- Fair Share
Housing Center of New Jersey
Cherry Hill, NJ**

Lucy Cruz Rivera
**Community Leader/ President -
Grupo de las Ocho Comunidades
Caño Martín Peña**

Omayra Rivera Crespo
**Taller Creando Sin Encargos
Professor- Polytechnic University**

Georgina Candal
Comisión de Derechos Civiles

Ana Matanzo
**Professor- University of Puerto
Rico Law School**

Marilucy González Báez
**Pro Bono- Inter American
University Law School**

Vivian Neptune
**Dean- University of Puerto Rico
Law School**

Sofía Gallisá Muriente
Beta Local

Lucilla Fuller Marvel
Taller de Planificación Social

Amaris Torres-Rivera, Esq.
**Democracy and Citizen
Participation Pro Bono, University
of Puerto Rico Law School**

Diane Yentel
**President/CEO- National Low
Income Housing Coalition**

Elio S. Martinez-Joffre, Arq.
**Escuela de Arquitectura UPRRP
Taller de Arquitectura Social
Taller de Diseño Comunitario**

Sofía Unanue Banuchi
Cynthia Burgos López
Alexandra Llegus
La Maraña Corp.

Ivonne María Marcial Vega, Arq.
**President- Colegio de Arquitectos
y Arquitectos Paisajistas**

Alejandro Torres, Esq.
**President- Colegio de Abogados y
Abogadas de Puerto Rico**

Liliana Cotto Morales, PhD
**Professor- University of Puerto
Rico**

Rosaura López-Fontánez MSW/LSCW
**Puerto Rico Community Network
for Clinical Research on Aids
(Puerto Rico CoNCRA)**

Laura M. Esquivel
**Director of National Advocacy-
Hispanic Federation**

Luis Gallardo
**Centro para la Reconstrucción del
Hábitat, Inc.**

Roberto Thomas Ramírez
**Coordinator/ Community
Organizer- Iniciativa para el Eco
Desarrollo de Bahía de Jobos
(IDEBAJO)**

Rafael E. Rodríguez Rivera
**Director- Legal Aid Clinic
Law School of the Inter American
University**

Annete M. Martínez Orabona, Esq.
**Director- Caribbean Institute for
Human Rights**

María E. Hernández Torrales, Esq
**Community Development Legal
Aid Clinic, University of Puerto
Rico Law School
/President- Fideicomiso de la
Tierra del Caño Martín Peña**

Stephanie Llanes, Esq.
**Center for Constitutional Rights
New York, NY**

Edwin Quiles
Taller de Arquitectura Social

Cecille Blondet
Espacios Abiertos

Marsha Katz
ADAPT Montana
Missoula, MT

Adriana Quintero
Voces Verdes

Dra. Sonia Auz
Fundacion Educativa CAF, Centro
Médico

Carlos A. Rodriguez Vidal, Esq.
Board Chair, Oficina Legal de la
Comunidad, Inc.

Beatriz Llenín Figueroa, PhD
Professor, PROTESTAMOS

Verónica Rivera Torres, Esq.
Derechoatucasa.org

Rev. Yamina Apolinaris
Executive Director- Corporación
Milagros del Amor, Inc.

Grace Blanco
Jenifer De Jesús Soto
Taller Salud, Inc.

Humfredo Marcano Vega, PhD.
Forest Ecology Researcher in
Puerto Rico

Zelidés Perdigón
Community Leader- Usubales,
Canovanas

Luisa R. Seijo Maldonado
Director- Instituto Universitario
para el Desarrollo de las
Comunidades

Manuel Rivera
Servicios Legales Comunitarios,
Inc.

Jossie Valentin
City Councilor, Holyoke,
Massachusetts

Emily Colón Albertorio, Esq.
Instituto de Educación Práctica

Gustavo A. García López, PhD
Assistant Professor, Graduate
School of Planning, University of
Puerto Rico- Rio Piedras

Rachel Hiskes
Fideicomiso para el Desarrollo de
Río Piedras

Martín Cobian
Centro de Apoyo Mutuo Jíbaro
(CAMJI), Lares

Joaquín Villanueva
Associate Professor, Gustavus
Adolphus College

Vanessa Gómez Ocasio, MHP, MSW,
LICSWA
Social Worker

Omar Ayala González
Coordinador General, Urbe Apie

Elisabeth Gehl
Habitat for Humanity

Julio López Varona
Make the Road CT

Xiomara Caro Díaz
Center for Popular Democracy

Anayra Santori
**Professor, Philosophy Department,
University of Puerto Rico- Rio
Piedras**

Michelle Suarez
Organize Florida

Jason Ortiz
Connecticut Puerto Rican Agenda

Teresa Basilio
Resilient Just Technologies

Nicole Hernández
Puerto Ricans in Action, LA

Adriana Garriga-Lopez
Todo Kalamazoo con Puerto Rico

Brenda Liz Santos Hernandez, MS
Directora Ejecutiva CREAARTE, Inc.

Eddie Rosario
**NYC Chapter Labor Council for
Latin American Advancement**

Michael Kink, Esq.
**Executive Director. Strong
Economy For All Coalition**

Jorge López Martínez
**Alianza para la Paz Social
(ALAPÁS), Inc.**

Caridad Arroyo
**Instituto del Desarrollo de la
Juventud**

Sor M. Julia Cintrón Espinel
Director IDIIFCO

Desiree González Negrón
**Graduate Teacher, Family Ecology
and Preschool Education**

Jannette Lozada Sabraastro
Valle Hill, Canóvanas

Sandra I. Torres-Rivera
Bill's Kitchen, Inc.

Jose Luis Díaz
Centros Sor Isolina

Yorelis Rivera Amador
**Executive Director- Iniciativa
Comunitaria de Investigación, Inc.**

**Alliance for Puerto Rico,
Massachusetts**

Make the Road, Pennsylvania

Chicago Boricua Resistance

Progressive Caucus Action Fund

Diáspora en Resistencia