

CDBG-DR Action Plan

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I. EXECUTIVE SUMMARY

We are deeply grateful to the United States Congress and the U.S Department of Housing and Urban Development (HUD) for the allocation of \$1,639,381,000.00 in Community Development Block Grant - Disaster Recovery (CDBG-DR) funding that will support our recovery efforts. The HUD allocation was published in the Federal Register on January 16, 2025 (90 FR 4759). Funds associated with FEMA Disaster DR-4724-HI (Hawai‘i Wildfires), hereinafter referred to as the “Maui Wildfires,” will be administered by the County of Maui Department of Management, Office of Recovery. CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted.

CDBG-DR is a responsive funding source intended to repair, restore, and rehabilitate communities after major disasters. In compliance with HUD requirements, this Action Plan identifies unmet needs, many of which were identified and outlined in our proposed long-term recovery plan. The Action Plan outlines how funds will be used to address remaining unmet need in the County of Maui (the County) following the Maui Wildfires. The programs outlined in this Action Plan will distribute CDBG-DR funding and ensure that disaster-affected populations with economic and housing challenges are prioritized. Approval of this document by HUD will enable us to utilize the CDBG-DR funds to help our people return home.

The County submitted an Administrative Action Plan (Admin Action Plan) to access Program Administrative Costs (PACs) funding prior to HUD’s certification of financial controls, procurement processes, and adequate grant management procedures, in compliance with the Universal Notice. The Admin Action Plan outlines specific pre-award administrative activities and budgeting, ensuring these costs do not exceed five percent (5%) of the total CDBG-DR allocation.

For this Action Plan, allocated funds will be divided between five (5) sectors, as seen Table I-1 below.

Table I-1. CDBG-DR Funds Proposed Allocation

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to LMI
Administration	\$ 81,969,050.00	5.0%	N/A
Housing	\$ 903,579,950.00	55.1%	70%
CDBG-DR Mitigation Set-Aside	\$ 213,832,000.00	13.0%	70%
Economic Revitalization	\$ 15,000,000.00	0.9%	70%
Infrastructure	\$ 400,000,000.00	24.4%	70%
Public Services	\$ 25,000,000.00	1.5%	70%
Total	\$ 1,639,381,000.00	100%	70%
% of Total	100%	100%	70%

Identified MID Areas

Identifying the Most Impacted and Distressed (MID) area within the disaster impacted geography is fundamental to the CDBG-DR program, as it determines where funds can be spent. HUD

determined and conveyed in the allocating Federal Register Notice, 90 FR 4759 (Federal Register/Vol. 90, No. 10/Thursday, January 16), that the entire County is the MID area for the CDBG-DR funding. In the Federal Register Notice, HUD also indicated that the funds being distributed would be broken into two groups, with the County required to use 100 percent of their funding allocation to “address unmet disaster needs or mitigation activities that benefit the HUD identified MID areas.”

Determination of LMI Area

HUD’s Office of Policy Development and Research approved a tailored approach for determining Low- and Moderate-Income (LMI) Area (LMA) benefit specific to the Lahaina fire-impacted area as shown in Figure I-1. Although the Lahaina place boundary falls slightly below the 51% LMI threshold in both ACS 2011–2015 and 2016–2020 datasets (each showing 48%), HUD allows the County to use more recent and detailed Block Group-level data for the fire-impacted area, as shown in Table I-2 below. When isolating the fire-impacted area at the Block Group level, the data supports LMA qualification, allowing CDBG-DR investments serving this area to receive LMI benefit credit under HUD’s requirements.

Table I-2. Summary of Fire Impacted Block Groups – ACS 2016-20 data

<u>geoname</u>	<u>lowmod</u>	<u>lowmoduniv</u>
Block Group 1, Census Tract 314.02, Maui County, Hawaii	725	1,595
Block Group 2, Census Tract 314.02, Maui County, Hawaii	600	1,560
Block Group 1, Census Tract 314.04, Maui County, Hawaii	420	755
Block Group 2, Census Tract 314.04, Maui County, Hawaii	895	1,805
Block Group 3, Census Tract 314.04, Maui County, Hawaii	860	1,070
Block Group 3, Census Tract 314.05, Maui County, Hawaii	970	1,645
Block Group 4, Census Tract 314.05, Maui County, Hawaii	630	1,510
Total	5,100	9,940 51.3%

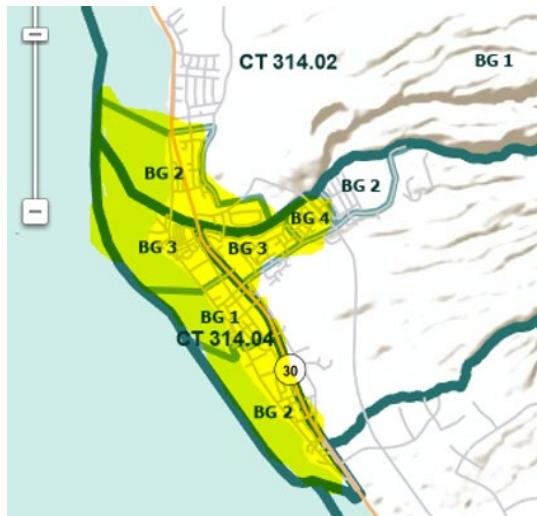


Figure I-1. Fire-Impacted Block Groups

Grantee Identified MID Areas

Because the entirety of the County makes up the defined MID area, no separate unmet needs analysis was conducted for the MID area. The unmet needs analysis in this Action Plan is generally applicable to both the grantee and applicable to the MID area, as they are one in the same. There are no additional Grantee Identified MID Areas.

A. Overview of the Impacts of the Qualifying Disaster

On August 8th, 2023, several fires broke out in different regions across the County which were spurred on by unusually high wind conditions impacting the island. The fires spread and intensified quickly as winds pushed the fires into a residential neighborhood in Kula and the community of Lahaina. Exacerbated by prolonged drought conditions, extremely high winds, and dry vegetation, the Lahaina fires originated on the western edge of a densely populated neighborhood and spread quickly. Embers carried hundreds of yards in the intense winds landing on homes and other structures, in what has since been categorized as a megafire. On August 10th, 2023, a Presidential Disaster Declaration was issued for the State of Hawai'i in response to the wildfires. The fires resulted in the loss of 102 lives, and the destruction of over 5,500 residential units in Lahaina.

The Maui Wildfires were a devastating event that led to significant loss of life, property, and infrastructure. The damages were extensive, affecting homes, commercial properties, public facilities, and critical infrastructure in an area of historical significance. Lahaina, once the capital of the Hawaiian Kingdom and home to Hawaiian royalty, is the primary urban, commercial, and service center for West Maui. The Maui Wildfires damaged or destroyed County infrastructure and public facilities, such as communication/information systems and facilities, senior centers, public schools, pump stations, signs and streetscaping, bus shelters, vehicles, parks, fences, recreation facilities/buildings, and wastewater facilities.

The Maui Wildfires left thousands of residents displaced and/or homeless, destroying thousands of residences and hundreds of businesses, with lost access to critical services like water, sewer, electricity, and telecommunications. In the aftermath, residents applied for Federal Emergency



Management Agency (FEMA) assistance, made insurance claims, and sought Small Business Administration (SBA) disaster loan assistance to start the recovery process. The disaster intensified ongoing challenges in the community, including scarce affordable housing, extremely high residential property costs, limited access to disaster recovery resources, and high construction material

Figure I-2. Lahaina Following the Wildfires

and labor costs. The Wildfires forced many residents to evacuate and relocate, shuttered local business, and prevented employees from working, highlighting the disaster's severe economic impact. Public services were strained in supporting displaced and otherwise affected residents with healthcare needs, housing and legal counseling, mental health, job training, and general health services. Public service demands increased dramatically, particularly for substance abuse treatment, mental and physical health care, and homelessness assistance¹.

Table I-3. Disaster Overview

Disaster Summary	
Qualifying Disaster:	Hawai'i Wildfires (Maui Wildfires), DR-4724-HI

¹ University of Hawaii Economic Research Organization (UHERO), May 2024. Maui Wildfire Exposure Study: Community Health, Wellbeing, and Resilience. Available at: <https://uhero.hawaii.edu/wp-content/uploads/2024/05/MauiExposureStudy.pdf> [Accessed Friday, February 21, 2025].

HUD-identified MID Areas:	County of Maui
Grantee-Identified MID Areas	N/A

Table I-4 shows the amount the County plans to set aside for CDBG-DR Mitigation.

Table I-4. CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$1,425,549,000.00
CDBG-DR Mitigation Set Aside:	\$ 213,832,000.00
Total Allocation:	\$1,639,381,000.00

B. Unmet Needs and Mitigation Needs Summary

The Action Plan includes assessments that are used to inform the allocation programs for HUD CDBG-DR: the Unmet Needs Assessment and the Mitigation Needs Assessment. The Unmet Needs Assessment identifies and quantifies impacts from the disaster event, accounts for other received and potential financial recovery assistance, and identifies what recovery gaps may remain. The assessment further described in Section II found a housing unmet need of approximately \$2.4 billion, an infrastructure unmet need of approximately \$1.9 billion, an economic development unmet need of approximately \$2.4 billion, and public services unmet need of approximately \$105 million. The Mitigation Needs Assessment identifies and explains the most critical hazards to consider when designing programs and allocating funding, which for the County include wildfire, windstorms, floods, and coastal erosion. CDBG-DR fund allocations were informed by a broad range of data to support disaster-impacted groups facing significant recovery challenges.

These Assessments are supported by data analyzed by the County, as outlined below.

Immediately following the wildfires, the County, in coordination with other public entities and non-profit organizations, began collecting disaster impact data in partnership with the Maui Emergency Management Agency (MEMA), Federal Emergency Management Agency (FEMA), and Small Business Administration (SBA). Disaster impact data was collected and compiled primarily through the following:

- FEMA Individual Assistance (IA) – Data is self-reported by residents into a publicly available portal detailing the impacts to their homes and property.

- FEMA Public Assistance (PA) – Data is collected by the County, municipalities, nonprofits, and other public agencies detailing the impacts to infrastructure and public facilities through Project Worksheets.
- SBA Disaster Loan Assistance – Data is self-reported by homeowners, nonprofits, and businesses using a loan application.

These data sets provide the most comprehensive data that is currently available on the impacts to public facilities, infrastructure, and property within the impacted area, when combined with the information gathered by the County.

The County has compiled and analyzed available data and information from the community to identify the remaining needs of the disaster-impacted community that were not addressed through insurance, FEMA, and SBA loan program assistance, along with other methods of support (i.e., fundraising and state grants).

[Planned Programs](#)

Based on our assessment of needs and affected populations, as well as feedback from thousands of community members, the Programs outlined in this Action Plan include:

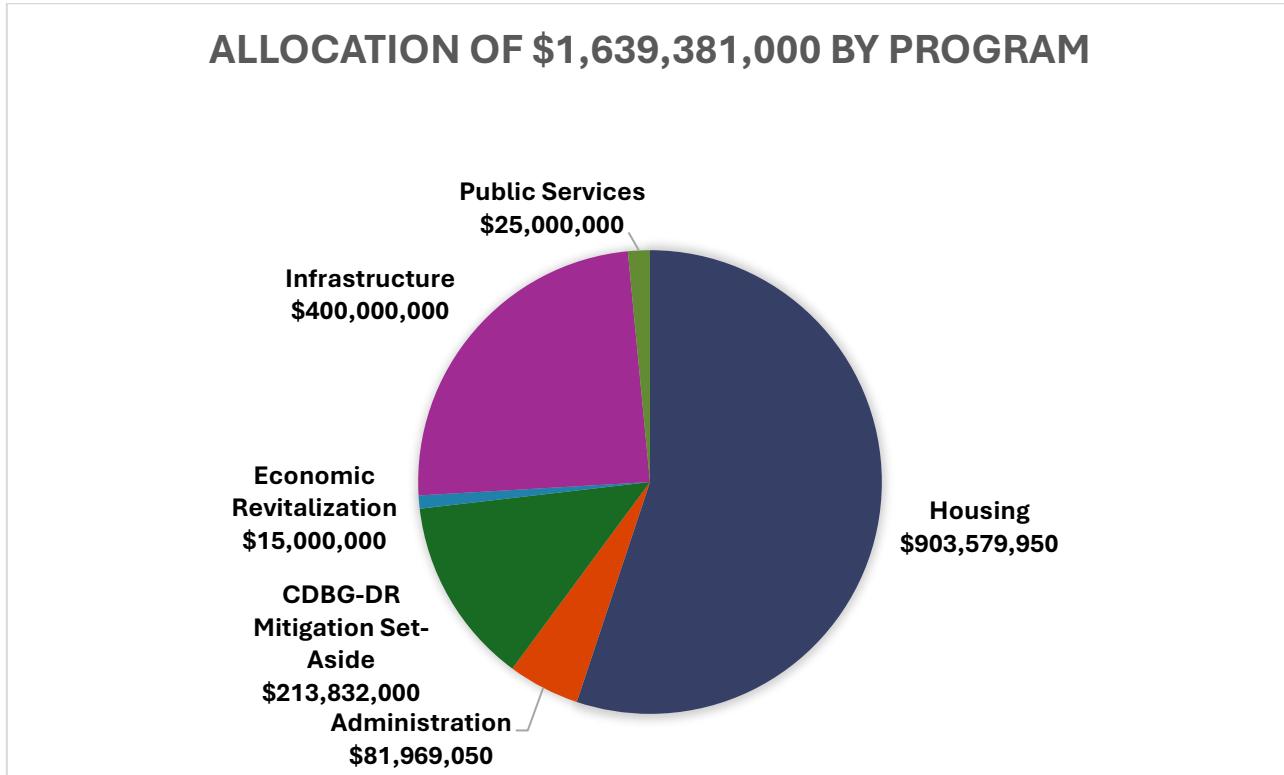
- Single-Family Reconstruction
- Multifamily Rental Housing Reconstruction
- Multifamily Rental Housing New Construction
- Single-Family New Construction
 - First-Time Homebuyer Opportunity
- Infrastructure and Public Facilities
- Economic Revitalization Programs
- Public Services
- Hazard Mitigation

Details regarding each of these programs are laid out in Section V.

The proposed funding for these projects is determined based on unmet need and mitigation needs which takes into consideration the other available sources of county, state, and federal funding. The County expects to receive additional funding from other federal programs and considers CDBG-DR funds as funding of last resort. Other sources of funding include FEMA Public Assistance (PA), the Hazard Mitigation Grant Program (HMGP), United States Department of Agriculture (USDA), U.S. Economic Development Administration (EDA), and the State Revolving Loan Fund (SRF).

Based on the impact to the population and the unmet needs, the County has identified Housing as the most critical unmet need. As such, it has allocated over 55% of funds to Housing programs. Administrative delivery capacity is a need across all activities. Program Administrative Costs are necessary to address these gaps and ensure effective implementation of recovery programs. While the total amount of other sources of funding is still fluctuating, the program allocations are based on the County's best unmet need estimate and mitigation needs at the time of publishing. As illustrated in Figure I-3 below:

Figure I-3. Allocation by Program Type



Community Engagement

The Action Plan incorporates extensive community input from eleven in-person and online engagement activities, with 3,833 Lahaina residents and stakeholders providing feedback on recovery efforts. County staff have embraced the opportunity to sit down with our community members, listening to those who love and care deeply for Maui. Our mission is to help as many people as possible, starting with disaster-impacted residents and our kupuna. Key areas of concern raised by our community include:

- Building affordable, safe, and resilient homes
- Increasing the availability of affordable rental units
- Expanding water resources
- Honoring and respecting our cultural traditions

We believe our proposed programs align with HUD requirements and will effectively address our community's long-term recovery needs. They are informed by our needs assessments as well as our significant engagement with the community.

II. UNMET NEEDS ASSESSMENT

HUD requires the County to conduct an unmet needs assessment to identify and quantify impacts from the disaster event, account for any potential financial recovery assistance, and identify what

recovery gaps may remain. The unmet needs assessment ensures that CDBG-DR recovery funds are allocated effectively for Lahaina's long-term recovery by analyzing housing, infrastructure, economic recovery, and mitigation needs. This assessment also considers ongoing public service needs and estimates remaining recovery gaps after accounting for funding from federal, state, local, and private sources, such as FEMA, the Small Business Administration, and insurance proceeds. The findings help identify and develop potential recovery projects, guiding the allocation of CDBG-DR funds in this Action Plan.

Table II-1 outlines the County's remaining unmet needs in the core CDBG-DR categories—housing, infrastructure, public services, and economic recovery—totaling \$6,897,448,318.77.

Table II-1. Estimated Unmet Need

Cost Categories	Total Estimated Need	Total Estimated Federal Assistance (SBA/FEMA)	Estimated Unmet Need
Housing	\$ 2,505,512,000.00	\$ 77,788,833.00	\$ 2,427,723,167.00
Infrastructure	\$ 1,932,225,151.77	\$ -	\$ 1,932,225,151.77
Economic Development	\$ 3,199,100,000.00	\$ 776,600,000.00	\$ 2,422,500,000.00
Public Services	\$ 105,000,000.00	\$ -	\$ 105,000,000.00
Total	\$7,751,837,151.77	\$854,388,833.00	\$ 6,887,448,318.77

A. Evaluate the Impacts of the Three Core Aspects of Recovery

The County analyzed available sources for qualitative and quantitative data related to the impacts of the Maui Wildfires. The analysis included a review of disaster damage, demographics, and socioeconomic data sets from the following sources:

- U.S. Census American Community Survey.
- HUD block group data.
- Local Business Impact Survey data.
- Building permit data prior to and following the wildfires.
- Public Housing Authority (PHA) program data and disaster impact data.
- Continuum of Care (CoC) Point-in-Time (PIT) count data and disaster impact data.
- County of Maui Property Appraiser data.

- Engagement with community-based organizations that support residents with disaster-related recovery challenges or impediments to access.

When a major disaster strikes, those struggling to recover include households with limited resources and access to assistance. To better identify the disaster impacts of the whole community, the County analyzed the aforementioned data sets to determine the following:

- The number of Federal Emergency Management Agency (FEMA) Individual Assistance (IA) applicants who are homeowners and renters.
- The remaining unmet housing need after receiving FEMA, Small Business Administration (SBA), and other available assistance.
- The location of the damaged properties.
- Damaged properties located in low-to-moderate income (LMI) neighborhoods.
- Damaged properties located in areas with limited access to public resources and infrastructure.
- Damaged infrastructure and public facilities that benefit LMI areas.
- Damaged nonprofit facilities and service disruptions.
- Homeless population point-in-time count before and after the disaster.
- Pre-disaster inventory of public and affordable housing.
- Disaster impacts to public and affordable housing.

The Maui Wildfires were a devastating event that led to significant loss of life, property, and infrastructure. The fires were exacerbated by a combination of prolonged drought conditions and

high winds. These factors contributed to the rapid spread and intensity of the fires. The damages were extensive, affecting residential homes, commercial properties, public facilities, and critical infrastructure. The most impacted were residents in areas with significant damage and limited access to recovery resources. The fires also severely disrupted local businesses and essential services,



Figure II-1. Lahaina Post Debris Removal

exacerbating the socioeconomic challenges faced by the community. In summary, the wildfires caused widespread destruction across several categories of need, impacting a wide and varied population, which highlights the urgent need for comprehensive recovery and mitigation efforts to build a more resilient community in the County.

Examining the available data and information gathered by the County shows unmet housing, infrastructure, economic development, and public services needs following the disaster, as outlined below.

1. Housing Unmet Need

Rental and Owner-Occupied Single Family and Multifamily Housing

Many homeowners in the County faced significant housing challenges prior to the August 2023 wildfires, including affordability and limited supply. Since 2000, home values in the County have increased by 339%—the second highest growth rate in Hawai‘i. In the 12 months preceding the disaster, the median home price reached over \$1 million, but the number of available homes only increased slightly in the past five years².

Pre-disaster housing supply challenges were further exacerbated by the availability of affordable rental housing in the County. According to the 2021 American Community Survey, Hawai‘i had the highest median monthly rent of any state in the nation. Specifically in Maui, the County reported the highest rent rates in the state, with the median apartment listed at \$2,500 per month.³

Land accessibility poses threats to housing growth both pre and post disaster with only 18% of residentially zoned land allowing multifamily construction.⁴ Out-of-state homebuyers also impact the ability for the County to expand housing stock for residents, with roughly half of all condominiums being purchased by out-of-state individuals.⁵

To obtain more accurate information regarding housing units destroyed, the County utilized data from its Tax Assessor records, derived from a wildfire-related homeowner tax exemption program⁶. The County verified these destroyed properties using satellite imagery taken before and after the fire. Complete loss insurance determinations supplemented satellite imagery forming the basis of the County’s loss estimation. The County then accounted for FEMA IA and SBA Homeowner loans, applying these amounts to determine the estimated unmet need estimate.

² University of Hawai‘i Economic Research Organization. (2023). *The Hawai‘i Housing Factbook*. Retrieved from https://uhero.hawaii.edu/wp-content/uploads/2024/05/TheHawaiiHousingFactbook_Main_2023.pdf

³ U.S. Census [American Community Survey \(ACS\)](#)

⁴ ibid

⁵ ibid

⁶ County of Maui (2024). Records pertaining to the County’s Wildfire Tax Exemption Program. Internal Excel Report, County of Maui Tax Assessor Records.

This dataset was considered more comprehensive than the available FEMA and SBA data, with both rental units and owned dwellings included in Table II-2, showing 5,527 total residential units destroyed by the Maui Wildfires.

Table II-2. Housing Unit Impact Table

Data Source	Number of Owner Units Destroyed	Number of Rental Units Destroyed	Total Destroyed Residential Units
County Tax Assessor Data	1,256	4,271	5,527

When the County used Tax Assessor records to assess destroyed residential properties, much of the data was outdated, in some cases by 20 years or more, showing an average property value of approximately \$350,000, which does not reflect current market conditions. Utilizing the 2022 Census 5-Year ACS data, the median combined land and home value in Maui was \$858,000 and \$841,000 in Lahaina. Accounting for older valuation data and current reconstruction costs, the County determined that \$1,000,000 is a more realistic average cost to rebuild a home in Maui. This estimate is for quick calculations and excludes land costs, ensuring a straightforward approach when evaluating overall program expenses.

For program design and detailed unit cost projections, the County will use cost ranges and precise calculations that account for home size variations, material costs, and economies of scale. The \$1,000,000 estimate is based on a standardized cost per square foot (\$550), which includes a 6% inflation factor. This was incorporated to account for contingency needs and potential future increases tied to the Consumer Price Index (CPI), ensuring the program's budget remains flexible and responsive to changing construction costs. These measures ensure the program remains adaptable and capable of delivering on its objectives without compromising quality or scope. This estimate accounts for a mix of 2-, 3-, and 4-bedroom homes.

To account for potentially insured properties, the County applied FEMA's data⁷ indicating the percentage of owner-occupied and rental destroyed units that were recorded as insured. Approximately 72% of destroyed owner-occupied homes and 78% of destroyed rental property was recorded as insured. However, even those with insurance coverage, are likely to be underinsured.

Determining the extent of underinsurance among homeowners in Maui is challenging due to a lack of localized data. However, national studies provide insight into this issue. According to the Insurance Information Institute, the average U.S. homeowner is underinsured by 23%, with some policies falling short by as much as 60%. While no comprehensive study exists for Maui specifically, data from Hawai'i suggests a significant gap in coverage, with reports indicating that between 375 and 390 condominium buildings are underinsured due to escalating premiums. Additionally, the low assessed values of homes in Lahaina indicate that many were older structures, likely underinsured, and not up to modern building codes, further increasing the financial gap homeowners face in rebuilding⁸.

Given that Maui has a high concentration of multigenerational homes, it is likely that many properties have not had their insurance values adjusted to reflect rising construction costs. Additionally, rising insurance premiums have led some homeowners to opt for lower coverage levels or exclude key protections. Based on these factors, a 40% underinsurance rate is applied—a figure that exceeds the national average (23%) but remains below extreme cases (60%). Therefore, instead of applying the full \$1,000,000 average rebuild cost to insured units, a 40% underinsurance factor was applied, resulting in an estimated underinsured value of \$400,000 per insured home.

Additionally, the \$1,000,000 value was applied to both owner-occupied and rental units for properties containing 1-3 units. Properties with more than 3 units had the per unit value reduced by 30%, bringing the per unit value to \$700,000. Rebuilding multi-unit properties benefits from economies of scale, shared infrastructure, and reduced material and labor costs, typically

⁷ Federal Emergency Management Agency (FEMA). (2024). Maui County IA applications summary [April 2024]. Internal document, U.S. Department of Homeland Security.

⁸ AP News. (2025, January 15). Hawaii lawmakers vow to stabilize property insurance market as climate change fuels higher premiums. <https://apnews.com/article/hawaii-climate-change-property-insurance-9119f220251bb44eced5ffb4ddd80b15>

lowering per-unit costs by 30% compared to single-family homes⁹. The resulting damage estimates are provided in Table II-3 below.

Table II-3. Estimated Unmet Need (Insured/Uninsured)

Unit Type	Estimated Average Unmet Need Per Unit	Number of Units Destroyed	Estimated Total Unmet Housing Need
Owner-Occupied with Insurance	\$400,000.00	904	\$361,600,000.00
Owner Occupied without Insurance	\$1,000,000.00	352	\$352,000,000.00
1-3 Unit Insured Rental	\$400,000.00	863	\$345,200,000.00
1-3 Unit Uninsured Rental	\$1,000,000.00	244	\$244,000,000.00
3+ Unit (Multiunit) Insured Rental	\$280,000.00	2,468	\$691,040,000.00
3+ Unit (Multiunit) Uninsured Rental	\$700,000.00	696	\$487,200,000.00
Multi-Family Affordable Units (11 Projects)¹⁰	\$24,472,000.00 ¹¹	692	\$24,472,000.00

⁹ Estimate Florida Consulting. How much does it cost to build a multi-family home? <https://estimatorflorida.com/how-much-does-it-cost-to-build-a-multi-family-home/>

¹⁰ These 11 projects may need funding to cover insurance gaps. This document will assume a 20% insurance gap across the board as a potential unmet need. The actual unmet need will not be known until the projects commence design and construction.

¹¹ This is the total unmet need cost of all the projects and not the Estimated Average Need per Unit.

Total	N/A	5,527	\$2,505,512,000.00
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Public Housing and Other Affordable Housing

In addition to privately owned single and multi-family housing units, government and non-profit-owned affordable housing facilities were also destroyed by the fires. These include 11 affordable housing complexes, with a total value estimated at over \$240 million. Because FEMA PA is being sought for most of these facilities only the 10% cost share is being included in the unmet needs estimate.

Once the estimated damages to residential units were calculated, the amount of recovery assistance already provided must be subtracted from the estimated damages to find the remaining unmet need that is required by HUD, which includes the following:

- Subtracting Insurance compensation, based on FEMA data on estimated insured properties.
- Subtracting other recovery funding sources, to account for SBA homeowner recovery loan funds and FEMA IA funds.

The total amount of SBA funds for residents as of January 2025 was \$43,788,833.00 and the total amount from FEMA, based on February 2025 IHP data www.fema.gov/about/openfema/data-sets, was \$66,905,257.00, as shown below in Table II-4. To ensure a conservative estimate, we assume that at least 50% of Individual Assistance (IA) funding was allocated to non-housing-related expenses, such as temporary housing, personal property replacement, and other essential needs. Consequently, only the remaining portion is considered in assessing funds available for housing reconstruction. As such, we will use \$34 million as our FEMA IA funding amount. Table II-4 shows how the remaining unmet needs have been calculated using the available data.

Table II-4. Calculated Housing Unmet Needs Estimate

FEMA IA Funds	SBA Recovery Loans	Total Estimated Federal Assistance (SBA/FEMA)	Total Estimated Damages	Remaining Unmet Need
\$34,000,000.00	\$43,788,833.00	\$77,788,833.00	\$2,505,512,000.00	\$2,427,723,167.00

Emergency Shelters, Interim, and Permanent Housing

The wildfire resulted in the destruction of thousands of homes placing more than 12,000 people in a temporary state of homelessness¹². The wildfires also destroyed Ka Hale A Ke Ola's Westside shelter in Lahaina. Households and individuals utilizing this facility had to be transferred to Ka Hale A Ke Ola's Central facility. The State, in coordination with Project Vision Hawai'i, opened Pu'uhonua o Nēnē, a temporary tent shelter for Maui Wildfire survivors who were experiencing homelessness before the disaster.

It is important for the County to assess its point-in-time count before and after a disaster to assess the impacts on those experiencing housing instability and homelessness. The available data shows approximately 700 homeless individuals in the County of Maui and approximately 650 after the Maui Wildfires¹³.

After the Maui Wildfires, many families were displaced from their homes with limited resources for support. The federal government provided the State with public assistance funding for the provision of disaster related temporary congregate and non-congregate shelters (NCS). NCS hotel units were made available on a temporary basis in response to acute shelter demand due to the wildfires and thousands remained active as of the Point in Time (PIT) count. HUD requested that displaced households residing in congregate or NCS hotels be included in the sheltered count, as of the date of the PIT count. Although all congregate shelters had closed by the night of the annual Point-in-Time (PIT) count, many individuals remained housed in Non-Congregate Shelter (NCS) hotels.¹⁴

A June 2024 comprehensive survey provides additional evidence of the housing crisis facing fire survivors.¹⁵ Among the 1,105 fire-impacted residents surveyed, 61% reported losing their housing in the disaster. 59% of fire survivors reported having to move three or more times since the fires,

¹² Jones, T. (2024, April 15). *Chronic housing shortage leaves Maui residents displaced a year after deadly wildfire*. PBS NewsHour. <https://www.pbs.org/newshour/nation/chronic-housing-shortage-leaves-maui-residents-displaced-a-year-after-deadly-wildfire>

¹³ Ka Mana O Na Helu, June 2024. Bridging The Gap CoC Homeless Point-in-Time Count January 22, 2024. Available at: https://www.btghawaii.org/media/uploads/2024_btg_pit_count_report_final.pdf [Accessed Monday, June 24, 2024].

¹⁴ Ibid.

¹⁵ Hawai'i State Rural Health Association, June 2024. The Struggles of Maui County. Available at: https://hsrha.org/wp-content/uploads/2024/08/2024-08-19-Maui-Countywide-and-Fire-Survivors-Analysis.FD_081924.pdf [Accessed Friday, February 21, 2025].

with nearly one in five having moved five or more times. The survey found that most fire survivors (78%) are still in temporary housing:

- 41% in temporary rental units or condos
- 22% staying with friends or family
- 12% in temporary resort housing
- 3% currently houseless

Only 18% of those surveyed reported securing permanent housing, while 4% relocated off island.

Total Housing Unmet Need

Based on the County's estimate, there is a housing recovery unmet need for affected owned dwellings and rental properties of **\$2,427,723,167.00**.

The disaster's impact on housing cannot be overstated, given how losing a home affects individuals and families. The lack of permanent housing creates an immediate threat to the community's health and wellness. Unstable housing creates uncertainty and stress, severely impacting physical and mental health, and increasing substance use and incidents of domestic violence. Individuals and families may be further away from their schools, jobs, healthcare, and support networks that are critical for recovery. For many kupuna and their caregivers, the loss of homes designed for aging in place has created serious accessibility challenges in temporary housing situations.

2. Infrastructure Unmet Need

The County has identified approximately \$1.9 billion in infrastructure projects critical to disaster recovery and long-term resilience. However, securing funding remains a significant challenge. While the County continues to actively pursue additional funding through state, federal, and other sources, many projects currently lack secured funding. CDBG-DR funds will be used to address remaining unmet needs where other assistance is unavailable or insufficient. This report outlines the current funding landscape, the status of infrastructure projects, and the necessary steps to close the funding gap.

Highlight of Needs

Of all categories of unmet needs, infrastructure needs are the most straight forward to identify due to the work of the County's infrastructure departments to identify needed projects and estimate cost. The County has identified well over 100 infrastructure projects that need to be funded. Infrastructure needs range from repairing roadways to replacing wastewater systems to purchasing shoreline properties for mitigation purposes. Below are examples of the most significant costs.

Water Reliability Needs: A water shortage declaration has been in effect in Lahaina since 2022 due to drought related water reductions and extended periods between rainfall. During the Maui Wildfires, the water system experienced critical failures that severely hindered firefighting efforts. As the Lahaina community rebuilds, additional water sources will be required to ensure adequate

capacity, so the water system can operate reliably without overextending existing infrastructure. The Lahaina water system is aging and resiliency and hardening measures are needed to reduce the risk of failure to protect the remaining community and the rebuilt Lahaina neighborhoods. A part of resiliency and redundancy is increasing transmission lines and water storage. Many projects are needed to ensure water supply reliability and firefighting capabilities in West Maui, totaling approximately \$250 million. These projects involve the following:

- Water source and storage for drought and wildfire resilience,
- Post fire reliable capacity and source development,
- Water infrastructure resilience and hardening,
- Water infrastructure transmission,
- Recycled water for drought and wildfire resilience, and
- Emergency energy back-up generation

Wastewater Needs: During the wildfire, sewer pump stations were severely damaged and need to be replaced. Several of these pump stations are also located in flood prone and hazardous areas and should be hardened or located at a higher elevation. In order to accommodate the full rebuild in Lahaina with additional density, strategic projects will be necessary to accommodate flows to the wastewater treatment plant. The Wahikuli neighborhood, which was served by individual cesspools, was severely impacted by the fires. Building back will require these homes to meet compliance with the 2050 Cesspool Conversion Law and tie into the County's wastewater system. Currently the County has over \$100 million in needed wastewater projects for rebuilding, including:

- Replacement and relocation of pump stations,
- Replacement and relocation of sewer force mains,
- Hardening and right sizing sewer infrastructure to accommodate rebuild density
- Replacement and construction of new force mains for R-1 water,
- R-1 distribution system expansion, and
- Retiring of cesspools and replacement with municipal sewer

Transportation Needs: There are over 30 miles of roadway within the burn zones of the Maui Wildfires. A damage assessment report that was developed following the fires concluded that over \$11 million in damages occurred to roadway surfaces, sidewalks and signage alone. The West Maui transit hub was completely destroyed by the fire, including several bus shelters and a Maui Bus. The County is comprised of three inhabited islands, and the only ferry service between the islands operated out of Lahaina Harbor. In 2022, the State opened a brand-new pier and waiting pavilion at the harbor, which were both destroyed by the fire. The estimated cost to rebuild Lahaina Harbor is \$30 Million.

In addition to the transportation facilities that were lost or damaged, the fire shed light on the need for additional transportation network connections and improved evacuation routes. The County of Maui Department of Fire and Public Safety Wildfire After Action Report (AAR) and

evacuation software evaluation exercises identified a series of recommended improvements.¹⁶ Facilitating these improvements is expected to require property acquisitions and facility construction of approximately 6 miles of additional connections. In addition, the report recommends undergrounding of power lines along urban wildland interfaces and evacuation routes to protect against future power lines generating fires. These costs are still being developed based on potential project scopes.

Front Street: Front Street, in Lahaina, was the iconic, seaside roadway known for quaint shops and restaurants that looked out over the storied channel between Maui and Lāna'i. During the 2023 fire in Lahaina, all of the buildings and businesses along the shoreline burned down, leaving exposed piers and pilings, damaged seawalls and opening up the infrastructure under Front Street to much higher risk of erosion. Front Street is the primary corridor of the County's sewer main, water main, electrical lines, and gas line. Protecting Front Street and its subsurface infrastructure is essential to the restoration and rebuilding of Lahaina Town and its surrounding neighborhoods.

During the rebuild, the County will need to repair the existing seawall and extend the seawall and railing to further protect Front Street from erosion risks and the nearshore waters from sewage spills and infiltration. The estimated cost for shoreline stabilization and land improvements is expected to be well over \$10 million.

Senior Services (Kupuna Support)

Maui's kupuna (elderly) population makes up 17% of the County¹⁷, who face increasing challenges due to the destruction of essential community facilities, a lack of senior housing, and reduced access to healthcare. The loss of the West Maui Senior Center has left many without a central hub for social services, fitness programs, and wellness support. In addition, affordable assisted living and home care options are extremely limited, forcing some seniors to relocate or live in unsuitable conditions. To rebuild, an estimated \$80 million is required to construct a new senior center, even without the additional costs to improve in-home care programs and provide transportation assistance for elderly residents. The estimated \$80 million investment for the West Maui Senior Center is based on a construction cost of \$800 per square foot, which reflects a balance between residential construction (\$550 per sq. ft.) and commercial facility development (\$1,000 per sq. ft.). Given the needs of the community, this investment may be used to construct two separate facilities to better serve the kupuna population across multiple locations.

¹⁶ [2023-Wildfire-After-Action-Report](#) August 2023

¹⁷ U.S. Census Bureau. (2022). *American Community Survey 1-Year Estimates: Maui County, Hawaii - Age and Sex*. Retrieved from <https://data.census.gov/>

Sources of Infrastructure Funding

The County is pursuing all available sources of funding. These sources include but are not limited to FEMA Public Assistance (PA) funds, FEMA Hazard Mitigation Grant Program (HMGP) funds, EPA sourced State Revolving Loan Funds (SRF), and additional state and federal annual appropriations. PA funding is typically provided through FEMA for infrastructure repair and replacement to eligible applicants based on eligible damages, but the total obligations have yet to be confirmed. HMGP funding is provided to rebuild in a way that mitigates future loss and is available statewide and administered by HI-EMA. The State has initially signaled that the County will receive a limited amount of HMGP funding to reduce a portion of unmet need. SRF provides low-cost financing to communities for water related infrastructure. Funds flow through the State Department of Health, and the County expects but is not guaranteed funds from the SRF for water related projects.

The County is also exploring opportunities through the U.S. Economic Development Administration's Public Works and Economic Adjustment Assistance (PWEAA) program, which may provide disaster supplemental funding for infrastructure projects that foster long-term economic resilience. In addition, the County will assess eligibility for limited U.S. Department of Agriculture Rural Development (USDA-RD) funding that may support infrastructure improvements in designated rural areas. These sources are competitive and subject to federal availability, but the County will actively monitor and apply to relevant opportunities as they become available.

While various federal and state funding sources exist, only \$32 million in HMGP funds are committed at this time. The County will continue to seek and coordinate additional funding to supplement CDBG-DR resources and address infrastructure needs to the greatest extent possible. Continued engagement with state and federal agencies will be necessary to determine eligibility and secure funding commitments.

Key Actions:

- Secure State & Federal Funding – Engage agencies for funding commitments.
- Prioritize Critical Projects – Define a ranking system based on urgency and feasibility.
- Explore Alternative Strategies – Identify additional grant opportunities or partnerships.
- Coordinate with Stakeholders – Align efforts with FEMA, HUD, and state partners.

All of these actions are being taken at this time.

Infrastructure Funding Gap

The County faces a critical infrastructure funding gap, with no certainty of external funding sources beyond expected mitigation projects. If additional funding is not secured, difficult decisions will be required to strategically allocate limited resources. The County must continue to remain proactive in seeking financial support, prioritizing projects based on necessity and feasibility, and coordinating efforts with key stakeholders. With a clear funding strategy and an adaptable recovery plan, the County can ensure that its most essential infrastructure needs are met while laying the groundwork for a more resilient future.

3. Economic Revitalization Unmet Need

Although the long-term impact is yet to be determined, available data shows the wide-reaching, negative economic impact that the disaster has already caused in the community following the Maui Wildfires. Using available data on the financial effects to the livelihoods of those affected helps to provide a more comprehensive understanding of recovery needs across the impacted area. Taken together, the data shows losses to businesses, tourism slowdowns, and the corresponding reduced funding influx and business incubation that can be linked to the disaster, as also highlighted within the Lahaina Long-Term Recovery Plan (LTRP) that was published in December 2024.

A major disaster event has an economic impact within the community that usually starts with the immediate loss of services and lowered (or halted) business output for companies located in and around the impact zone. An event's true economic impact becomes clearer when looking beyond the effects that can be immediately seen, because the long-term effects persist over time as the local tax base recovers. Wildfires can severely reduce economic activity through commercial property damage, reduced tourism, and reduced business activity. The reduced business activity results in higher unemployment and additional insurance claims following the wildfires.

While pinpointing a true dollar amount for impact and recovery need is not simple, the economic impact calculated for this Action Plan is based on currently available data sets and will be updated as necessary to inform a data-centric approach to the allocation and administration of HUD CDBG-DR assistance. The economic need assessment in this Action Plan uses available resources to understand and quantify immediate impacts to businesses (buildings and content) in the impact zone that were affected by the 2023 Maui Wildfires. For economic revitalization needs analysis purposes, loss of businesses and business revenue as well as loss of wages due to the disaster are key indicators.

The 2023 Maui Wildfires had a staggering impact on the workforce throughout the County, as tourism is a key economic driver, particularly in West Maui. The data shows that the wildfires contributed to a sharp reduction in tourism. Consequently, only about 70% of individuals employed in tourism before the fire still have jobs in the sector¹⁸. Further, 29% of impacted

¹⁸ The Economic Research Organization at the University of Hawai'i (UHERO). (2024). Maui Recovery Dashboard – housing & jobs. The University of Hawai'i. https://analytics.uhero.hawaii.edu/maui-recovery-dashboard/housing-and-jobs?_gl=1*h6azes*_ga*NjkyMTQ5ODk1LjE3Mzk0MTA3MjU.*_ga_ZBKYD51L5N*MTczOTQxMDcyNS4xLjEuMTczOTQxMDc0MS4wLjAuMA

households live below the poverty line, a 15% increase from before the fire, and three times the average for the County in 2023¹⁹.

The Hawai‘i Department of Business, Economic Development and Tourism (DBEDT) ²⁰ has estimated a loss of \$2.7 million per day for the approximately 800 business establishments directly affected by the Lahaina wildfires for a total reduction of \$1.5 billion as determined by the Hawai‘i Tourism Authority²¹.

The Federal Emergency Management Agency (FEMA) records from visual inspections after the disaster indicated there were 281 commercial structures destroyed by the fire. As of June 30, 2024, total claims collected from over 200 insurers for all lines of business totaled approximately \$3.3 billion, of which \$1.2 billion was for commercial properties²².

From January to February 2024, the County of Maui’s Office of Economic Development (OED) conducted the Maui Business Health Check survey, receiving responses from 290 businesses. Data from the survey sheds light on the post-wildfire challenges faced by the Maui business community and shows the hurdles that businesses encounter, while showing the economic impact from the Maui Wildfires. Among the 290 survey participants, 106 businesses (36.5%) were from Lahaina. While these businesses represent a diverse range of industries, the top sectors included tourism and hospitality (27.6%), retail (22.8%), food and beverage (14.5%), and the arts, culture and entertainment (11.4%)²³.

Responses to the survey from businesses show that 37.6% were still evaluating the wildfires’ impact on their business plans, with 36.2% having significantly scaled back operations, but with plans to rebuild on Maui. 52.4% of businesses reported no change in their business location, with 27.8% lacking a physical space, and 19.8% have already relocated. The top reasons for businesses relocating were due to losing a building in the fire (75%), unaffordable leases (8.9%), and fire damage/necessity for renovation (3.6%). Financially, 43.8% of reporting businesses described themselves as “critical, on life support,” with only 3.1% reporting “doing great, feeling great.”

¹⁹ Ibid.

²⁰ Department of Business, Economic Development & Tourism (DBET). (September 2023). Maui Wildfire Impacts Economic Recovery. <https://dbedt.hawaii.gov/blog/23-47/>

²¹ Hawai‘i Tourism Authority. (2024) Visitor Arrivals and Visitor Spending Decreased in April 2024. <https://dbedt.hawaii.gov/blog/24-29/>

²² Economic Recovery Support Function for Maui County, Hawai‘i. 2024. Breaking Down Barriers to Business Recovery. FEMA Mission Assignment, Hawai‘i Wildfires (DR-4724-HI). Updated August 31.

²³ Lahaina Long-Term Recovery Plan <https://www.mauicounty.gov/DocumentCenter/View/151316/Lahaina-Long-Term-Recovery-Plan-Report-2024-12-21>, December 24

More than half of the reporting businesses faced challenges in retaining or hiring employees, resulting in 1,936 reported job losses, as many residents lost a place to live and no longer could work in West Maui, as before.

The economic impact resulting from the August 2023 wildfires can also be seen upon comparing the employment numbers available from the U.S. Bureau of Labor Statistic for the Kahului-Wailuku-Lahaina zone on Maui for 2022 through 2024, with clear differences following the disaster that can be seen through the 2024 numbers. The data shows a clear effect on employment starting in September 2023, right after the disaster as shown in Table II-5 below. It shows a 10% drop in employment, which is approximately 7,000 jobs and shows one way that the wildfires directly affected the local economy²⁴.

Table II-5. 2022 – 2024 State and Area Employment, Hours, and Earnings Report

State:	Hawai‘i											
Area:	Maui County: Kahului-Wailuku-Lahaina											
Industry:	Total Nonfarm											
Data Type:	All Employees, In Thousands											
Years:	2022 to 2024											
Years:	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022	72.3	73.1	73.7	74.0	74.1	74.4	74.9	75.6	75.2	75.5	76.2	76.5
2023	75.9	76.8	76.2	76.6	76.9	76.8	76.3	74.3	68.5	69.2	70.2	71.4
2024	70.5	70.9	71.1	71.5	72.0	71.6	71.6	71.6	71.4	71.4	72.3	73.0(p)

²⁴ U.S. Bureau of Labor Statistics. (February 2025). Databases, Tables & Calculators by Subject – Kahului – Wailuku – Lahaina, HI. https://www.bls.gov/regions/west/hi_kahului_msa.htm

Given how a major disaster event has an economic impact within the community, the Small Business Association (SBA) makes low-cost disaster loans available to qualified businesses and their services are an important indicator of business impact. SBA business data in conjunction with HUD methods laid out in the Federal Register will inform the approach to identify property and content impacts to those businesses affected by the 2023 Maui Wildfires.

According to available SBA loan information²⁵ applicants in the County submitted 6,117 loan applications, which includes 1,275 requests for business loans and 1,686 Economic Injury Disaster Loan (EIDL) applications, with the remaining 3,156 for home loans. As of January 2025, the SBA has approved 2,350 loan applications, offering loans that total \$426,831,800.00, with \$120,328,741.00 disbursed so far. Of the total offered to applicants by the SBA, \$166,682,500.00 corresponds directly to documented business and economic injuries. Beyond the applications that are either pending or incomplete, anecdotal evidence suggests that some Maui small business owners may have walked away from the SBA process due to concerns about repaying a business loan or due to not having sufficient documentation to complete the application process. What is clear is that additional unmet needs still exist for many affected residents in the County after the final November 2024 SBA loan application deadline. Taken together, the data shows significant additional economic need exists in the County of Maui following the 2023 wildfires.

Table II-6. SBA Remaining Unmet Need

SBA Loan Type	Total Disaster Loan Amount Disbursed	Total Offered	Documented Remaining Unmet Need
Home	\$43,788,833.00	\$260,151,300.00	\$216,362,467.00
Business	\$33,351,608.00	\$111,066,000.00	\$77,714,392.00
EIDL (Economic Injury Disaster Loan)	\$43,177,300.00	\$55,614,500.00	\$12,437,200.00

²⁵ Small Business Administration (SBA). (January 2025). PDC Application Processing Statistics. Internal Document, SBA.

TOTAL	\$120,328,741.00	\$426,831,800.00	\$306,514,059.00
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Assessing Maui's Economic Recovery Needs Post-Wildfires

The devastating wildfires that struck Maui caused significant economic disruption, particularly for businesses reliant on the island's tourism-driven economy, as well as on agriculture. Between August 8, 2023, and April 2024, Maui experienced a severe drop in tourism, with approximately 50,000 fewer visitors arriving per month²⁶. Given that each visitor typically spends \$2,278.00 per trip, this decline resulted in an estimated \$1.5 billion in lost tourism revenue over that period²⁷.

Commercial construction costs per square foot in Maui are significantly higher than residential construction due to several key factors. While high-end residential construction averages between \$375 and \$1,250 per square foot, commercial projects require additional expenditures that drive costs even higher. Commercial buildings must adhere to more stringent safety and accessibility codes, incorporate complex mechanical, electrical, and plumbing systems, and support heavy-duty infrastructure to accommodate business operations. The cost of commercial-grade materials, specialized equipment, and reinforced structural components further increases expenses.

Additionally, factors such as supply chain challenges, transportation costs to the island, and a limited skilled labor pool add premiums to both labor and materials. Beyond tourism losses, the fires destroyed numerous commercial structures, many of which were small businesses such as boutique shops, local restaurants, and service providers. As of June 2024, there have been 229 commercial insurance claims totaling approximately \$1.2 billion in losses, with around \$700 million already paid out in insurance settlements²⁸. Given Maui's unique business landscape and the high costs associated with rebuilding, commercial construction expenses remain significantly elevated in the aftermath of the disaster.

The broader business community also suffered secondary economic losses beyond direct tourism impacts. Local suppliers, service providers, and other businesses that depend on a healthy

²⁶ Hawai'i Department of Business, Economic Development & Tourism. (2024). *Visitor Statistics Highlights*. Retrieved from <https://dbedt.hawaii.gov/visitor/>

²⁷ Ibid.

²⁸ State of Hawaii Department of Commerce and Consumer Affairs. (July 2024). https://cca.hawaii.gov/ins/release-hawai%CA%BBi-insurance-division-releases-current-data-on-maui-wildfire-claims/?utm_source=chatgpt.com.

tourism ecosystem saw sharp declines in revenue. Using a conservative estimate of 30% of the direct tourism revenue loss, the broader business impact amounts to \$450 million.

The Maui Wildfires also damaged many acres of agricultural land, primarily grazing and ranchlands, as well as almost 20 miles of fencing. The impacts of the wildfire extended beyond the direct physical damages to land and businesses, as it had cascading effects on the economy locally and statewide. Businesses in Lahaina lost to the Maui Wildfires and the decline in tourism contributed to a significant reduction in demand for agricultural goods and services. Losses in personal incomes within the community further curtailed the demand for these products too. Given the intertwined nature of the local economy and agriculture products, including agricultural losses in calculating recovery needs is necessary.

Following the Maui Wildfires the U.S. Department of Agriculture (USDA) reported \$23,100,000.00 in agriculture losses on Maui. This includes a reduction in sales revenue estimated at \$5,100,000.00, the reduction in agritourism revenue at \$3,900,000.00, livestock losses valued at \$75,000, crop damages valued at \$5,400,000.00, and agricultural property damage at \$8,500,000.00.²⁹ Although the U.S. Department of Agriculture has contributed more than \$19,000,000.00 in emergency support to farms, plus other emergency and mitigation programs, considerable additional Economic Recovery unmet need still exists in the amount of \$4,100,000.00.

Workforce Development

The fires impacted workers in tourism, construction, and small businesses. 35% of Lahaina's workforce was tied to tourism, and the sector's slow recovery has left thousands without stable employment.

The Hawai'i State Rural Health Association (HSRHA) Survey, also captured demographic data that highlights economic vulnerabilities among fire survivors:³⁰

- 39% earn less than \$40,000.00 annually
- 35% are under- or unemployed
- 36% have children in the household

²⁹ United States Department of Agriculture. [News Release: Damage from wildfires and high winds on Hawai'i ag producers estimated at \\$23.1 million.](#) (2024, January 26).

³⁰ Hawai'i State Rural Health Association, June 2024. The Struggles of Maui County. Available at: https://hsrha.org/wp-content/uploads/2024/08/2024-08-19-Maui-Countywide-and-Fire-Survivors-Analysis.FD_081924.pdf [Accessed Friday, February 21, 2025].

Additionally, the demand for workers in construction, healthcare, and green industries has grown, yet many displaced workers lack the necessary skills to transition into these fields.

The decline in college enrollment among Maui County public high school graduates—from 57% in 2019 to 46% in 2023—highlights the need for expanded workforce development opportunities. Strengthening workforce training programs may include collaborations with local institutions such as the University of Hawai‘i Maui College (UHMC), vocational training programs, apprenticeships, and industry partnerships to create alternative pathways for career development. Expanding these opportunities would support Maui’s workforce needs while also providing young residents with viable options for employment and long-term career growth.

Investing in job training, vocational education, and small business recovery grants is essential to diversifying the local economy and ensuring long-term stability in the County. A \$45 million workforce development initiative would help train displaced workers for high-demand industries, provide small business recovery support, and promote economic self-sufficiency for Maui residents. The estimated \$45 million investment for workforce development is based on an average cost of \$3,000.00 per participant, covering instruction, training materials, facility space, equipment, and administrative support. We anticipate that approximately 10,000 to 15,000 displaced workers may require job retraining and career transition services, and the final program size will be adjusted based on actual participation and demand.

Total Estimated Economic Development Need

Adjusting for these refined calculations, the total estimated economic recovery need stands at \$3,199,100.00 billion, which includes:

- \$1.5 billion in lost tourism revenue.
- \$1.2 billion for business reconstruction.
- \$450 million in broader indirect business losses.
- \$4.1 million in Agricultural losses
- \$45 million in Workforce Development

Current Recovery Funding & Assistance

The current total estimated economic funding available stands at \$776,600,000.00, which includes:

- Insurance Payouts: As of June 30, 2024, \$700 million has been paid out for commercial property claims, helping to cover some of the rebuilding costs³¹.
- SBA Disaster Loans: The Small Business Administration (SBA) has disbursed \$76.6 million in business and economic injury loans, with \$154.3 million in total loan offers.

With a total of \$776,600,000.00 in available recovery funding and a total estimated economic recovery need of \$3,199,100,000.00, an estimate of the remaining economic unmet need is **\$2,422,500,000.00** for the County of Maui.

4. Public Services Unmet Need

Health and Wellness

The Maui Wildfires exposed severe gaps in public services that are essential for long-term recovery, particularly in the health and wellness sector. Recent survey research demonstrates that recovery needs extend beyond physical rebuilding to include mental health and community resilience.³² Over 70% of Lahaina residents reported increased anxiety, depression, or PTSD symptoms. Among fire survivors:

- 64% report their mental health has worsened since the fires, with over half showing symptoms of depression and 30% reporting moderate or severe anxiety³³
- 68% report experiencing delays in accessing healthcare
- 60% describe their community as "unhealthy" post-disaster indicate they or someone in their household needs mental health counseling.

Additional health outcomes further underscore the need to address health care post-disaster:³⁴

- Nearly half (46%) reported a decline in health compared to one year ago.
- 74% face heightened risk of cardiovascular disease due to elevated or prehypertension levels.

³¹ State of Hawaii Department of Commerce and Consumer Affairs. (July 2024). https://cca.hawaii.gov/ins/release-hawai%CA%BBi-insurance-division-releases-current-data-on-maui-wildfire-claims/?utm_source=chatgpt.com.

³² Hawai'i State Rural Health Association, June 2024. The Struggles of Maui County. Available at: https://hsrha.org/wp-content/uploads/2024/08/2024-08-19-Maui-Countywide-and-Fire-Survivors-Analysis.FD_.081924.pdf [Accessed Friday, February 21, 2025].

³³ University of Hawaii Economic Research Organization (UHERO), May 2024. Maui Wildfire Exposure Study: Community Health, Wellbeing, and Resilience. Available at: <https://uhero.hawaii.edu/wp-content/uploads/2024/05/MauiExposureStudy.pdf> [Accessed Friday, February 21, 2025].

³⁴ Ibid.

- Up to 60% may suffer from poor respiratory health.

A survey of fire-impacted residents has also revealed significant impediments to accessing essential physical health services:³⁵

- 47% report difficulty accessing primary care
- 41% struggle to access specialist care
- 39% face challenges with dental care
- 21% report problems accessing mental health services.

Despite widespread awareness of available services, impediments such as provider shortages and accessibility issues continue to prevent many from receiving the care they need. During consultation of developing the Action Plan, residents expressed widespread concern about the accessibility and adequacy of mental health and wellness services. The County faces a 43% shortage of behavioral health professionals, leading to long wait times and insufficient mental health resources. Many providers are themselves members of the affected community and are also in recovery, further limiting the availability of care. Additionally, substance abuse cases have increased, yet treatment facilities remain limited.

The wildfires introduced stress, loss, and displacement that have made access to care more urgent. This unmet need calculation is not a reflection of local failure, but rather of geographic isolation, workforce shortages worsened by high housing costs, and health infrastructure already operating at full capacity.

Hawaii currently spends approximately \$137 per person per year on public behavioral health services³⁶, drawing from state mental health agency (SMHA) expenditures reported to SAMHSA. These expenditures are supported by state appropriations, federal grants, and Medicaid.

However, this figure does not capture the full cost of supporting a community's recovery. It excludes:

- County-level investments in wellness or care coordination
- Out-of-pocket costs for prescriptions, devices, or therapy
- Private insurance and employment-based wellness supports

³⁵ Hawai'i State Rural Health Association, June 2024. The Struggles of Maui County. Available at: https://hsrha.org/wp-content/uploads/2024/08/2024-08-19-Maui-Countywide-and-Fire-Survivors-Analysis.FD_081924.pdf [Accessed Friday, February 21, 2025].

³⁶ American Addiction centers. (November 2024). Mental health spending by state across the US.

https://rehab.com/explore/mental-health-spending-by-state-across-the-us/?utm_source=chatgpt.com

- Losses incurred through displacement or job disruption

The wildfires caused not only emotional trauma, but also the loss of medications, medical devices, therapeutic routines, and employer-provided benefits. Residents with chronic conditions, including diabetes, asthma, PTSD, and depression, experienced gaps in care that continue to affect their health and stability.

To estimate the scale of unmet need, we apply a conservative but recovery-appropriate benchmark of \$200 per capita per year. This accounts for:

- Expanded demand for mental health services following disaster
- The cost of wellness services beyond behavioral health
- The need for care navigation and medication/device replacement
- The logistical complexity of delivering services across rural and island communities

Rather than use the full \$200 per capita figure, we calculate only the gap between existing spending and post-disaster need:

- Annual Behavioral Health Gap: $\$200 - \$137 = \$63$ per person per year
- County Population Estimate: 150,000 residents
- Annual Behavioral Health Unmet Need: $150,000 \times \$63 = \9.45 million
- Recovery Period Assumption: 6 years
- Total Behavioral Health Unmet Need: $\$9.45 \text{ million} \times 6 = \56.7 million

Nationally, Americans spend over \$6,000 per person annually on wellness-related activities and products, reflecting the importance and cost of maintaining health and wellness³⁷. While this figure includes both public and private spending, it underscores the magnitude of investment required to maintain wellness, even under normal conditions.

To provide a conservative and public-facing estimate of unmet need for Maui's recovery context, we apply a modest benchmark of \$37 per person per year to cover:

- Replacement of lost medications and equipment
- Case management and wellness navigation
- Support for those who lost job-based health benefits
- Community-based health promotion during recovery
- Annual Wellness Services Gap: $150,000 \text{ residents} \times \$37 = \$5.55$ million

³⁷ Athletech News (January 2025), The US Wellness Economy is now worth \$2 Trillion. <https://athletechnews.com/us-wellness-economy-now-worth-over-2-trillion/>

- Six-Year Wellness Unmet Need: $\$5.55 \text{ million} \times 6 = \33.3 million

Total Estimated Public Services Unmet Need: \$90 Million

Component	Total (6 years)
Behavioral Health Services	\$56.7 million
Wellness Services & Support	\$33.3 million
Total Unmet Need	\$90 million

This \$90 million figure represents the estimated cost to bring the County's behavioral health and wellness services to a sustainable and recovery-appropriate level over six years. It does not include infrastructure or capital investments, and it does not assume the entire cost burden falls to a single funding source. It is a tool to help define the scale of the challenge and guide future investment.

Childcare

According to the 2020 U.S. Census Bureau, Lahaina had approximately 12,702 people (3,379 households), which included 837 children under age 5. National and state estimates suggest that 30-50% of children in low- and moderate-income families typically require subsidized care. At 50%, approximately 418 children in Lahaina require subsidized care. Childcare on Maui averages approximately \$1,000 per month per child, equating to \$5 million annually for families needing full-time care. Based on available funding levels through county and state subsidy programs, it is conservatively estimated that current resources cover about 50% of the demand. This leaves an estimated unmet need of \$2.5 million per year, **totaling \$15 million** over six years. This estimated gap prevents families from returning to work, which is essential for long-term recovery.

III. MITIGATION NEEDS ASSESSMENT

HUD requires the County to conduct a Mitigation Needs Assessment to guide recovery efforts, based on the best available data. This assessment analyzes the County's current Hazard Mitigation Plan (HMP), while considering the 2023 wildfires and the forthcoming 2025 update to the HMP, to identify and explain the most critical hazards to consider under the allocations made under this Action Plan.

The Assessment shows that the four most important hazards to consider for this Action Plan are High Windstorm, Flood, Coastal Erosion, and Wildfire. These hazards and their effect on the County support decisions on the County's planned use of the Mitigation Set-Aside funds in alignment with FEMA's Hazard Mitigation Grant Program and also inform this CDBG-DR Action Plan.

This Assessment involves the County conducting "a risk-based assessment, to inform the use of its CDBG-DR mitigation set-aside, considering identified current and future hazards" and "must, at a minimum, use the risks identified in the current FEMA-approved state or local Hazard

Mitigation Plan (HMP).” The County’s current HMP is titled “County of Maui Hazard Mitigation Plan Update 2020” and was developed by the Maui Emergency Managing Agency in coordination with the Steering Committee which consists of the following members:

- University of Hawai‘i Mānoa
- State of Hawai‘i, Department of Land and Natural Resources, Division of Forestry & Wildlife
- State of Hawai‘i, Department of Transportation
- State of Hawai‘i, Department of Hawaiian Homelands
- State of Hawai‘i, Department of Health
- State of Hawai‘i, Department of Education
- State of Hawai‘i, Department of Defense, State Hazard Mitigation Forum
- Maui Visitors Bureau
- Maui Metropolitan Planning Organization
- Maui Hero Project
- Maui Electric Company
- Maui County, Police Department, Lāna‘i
- Maui County, Office of Economic Development
- Maui County, Mayor’s Office
- Maui County, Fire Department
- Maui County, Energy Office
- Maui County, Emergency Management Agency
- Maui County, Department of Public Works
- Maui County, Department of Planning
- Maui County, Department of Fire and Public Safety, Fire Prevention Bureau
- Maui County, Council Members
- Maui Community Associations
- Feed My Sheep
- American Red Cross

It should also be noted that the current HMP for the County was developed before the 2023 Wildfire impacts that qualified the County for the resulting CDBG-DR funds. Therefore, some of the impacts, particularly those involving wildfires, were not accurately accounted for in the HMP, as they relate to the utilization of The County’s CDBG-DR funds. The County has taken into consideration the impacts from the wildfire and other related factors in addition to the information obtained from the HMP analysis in the development of this Assessment.

Because the entire County was designated as the MID Area, evaluation of the HMP as part of the unmet needs analysis also accounts for all factors impacting the MID Area.

A. Purpose of the Mitigation Needs Assessment

The Mitigation Needs Assessment examines current hazards as well as future risks, in order to determine which hazards must be considered when allocating CDBG-DR funds. Doing so involves

using existing resources to help the County make data-informed decisions on how funding will be utilized in this Action Plan.

This Assessment examines hazards and risks as they relate to community lifelines, using available data. Community lifelines are “indispensable services that enable the continuous operation of government functions and critical business and are essential to human health and safety or economic security.” The key lifelines are identified below:

- Safety and Security
- Food, Water, and Shelter
- Health and Medical
- Energy (Power and Fuel)
- Communications
- Transportation
- Hazardous Material

As also outlined within the current HMP, the lifelines highlight priority areas and interdependencies. Each lifeline is comprised of multiple components and essential elements of information needed to stabilize an incident.

Available data shows that West Maui is exposed to multiple environmental hazards that should be considered, with the County’s 2020 Hazard Mitigation Plan Update listing the primary hazards as wildfires, coastal erosion, flooding, windstorms, and landslides.³⁸ It is important to consider all hazards when planning recovery efforts because environmental events may be layered, as occurred with the Maui Wildfires when a spot fire ignited during drought conditions and was spread uncontrollably by a wind event.

Activities planned under this Action Plan will help reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters, consistent with the available data. The Action Plan will prioritize activities that assist individuals and communities with unmet recovery needs, including those with limited access to resources, while also identifying projects that address remaining impacts of the disaster.

B. Overview of the Maui County Hazard Mitigation Plan Update 2020

The Maui County CDBG-DR Mitigation Needs Assessment is informed primarily by the 2020 Maui County Hazard Mitigation Plan. The 2020 HMP is the most current hazard mitigation document available and identifies goals and measures for hazard mitigation and risk reduction to strengthen communities and increase disaster resiliency and sustainability in the County. The HMP will help guide and coordinate mitigation activities and local policy decisions for future land use decisions. The information, data and analyses included in the 2020 HMP, however, do not reflect any impacts

³⁸ [2020-Maui-County-Hazard-Mitigation-Plan-Final](#) August 2020.

and damages from the devastating 2023 wildfires. These newer changes will be assessed in the 2025 update, which will be ongoing through August of 2025.

The current HMP follows Disaster Mitigation Act (DMA) planning requirements and associated guidance for developing local Hazard Mitigation Plans. Mitigation actions presented in the HMP update are activities designed to reduce or eliminate losses resulting from natural hazards. The County aligned its mitigation actions in the HMP with FEMA's Community Rating System in the following categories:

- 1) Emergency Services
- 2) Natural Resource Protection
- 3) Public Education and Awareness
- 4) Property Protection

The HMP identifies 50 mitigation actions for implementation, which were ranked by priority, based on hazards that are regarded as possible or likely in the County. These included Tsunamis, Landslides, Extreme Heat, Health Risks, Earthquakes, Hazardous Materials (HAZMAT), Extreme Cold, Dam and Reservoir failure, and Volcanic Hazards. While these hazards are addressed within the HMP, they are much less connected to the 2023 wildfires in West Maui, and all need not be analyzed within this Action Plan.

The high probability and critical impact hazards for the County, with a focus on West Maui in particular, will inform this Action Plan, as analyzed below:

1. Identifying High Probability and Critical Impact Hazards

The review of the County's current Hazard Mitigation Plan (HMP) focused on the Risk and Vulnerability Assessment, the Capability Assessment, and the Mitigation Strategy. Part of the analysis of the Risk and Vulnerability Assessment included the review of each identified hazard, and the Priority Risk Index (PRI) developed for these hazards. The PRI establishes a hazard risk value (1 to 4), with four being the highest. This is done by assigning a value and a weighing factor based on five categories: probability, impact, spatial extent, warning time, and duration. The HMP explains the methodology as follows:

“To calculate the PRI value for a given hazard, the assigned risk value for each category is multiplied by the weighting factor. The sum of all five categories equals the final PRI value, as demonstrated in the example equation below:”

PRI VALUE = [(PROBABILITY x .30) + (IMPACT x .30) + (SPATIAL EXTENT x .20) + (WARNING TIME x .10) + (DURATION x .10)]

The HMP developed a hazard vulnerability index for the County as a whole and for eight Community Planning Areas defined within the HMP, which include:

- West Maui
- Hāna
- Kīhei-Mākena
- Lāna‘i

- Makawao-Pukalani-Kula
- Moloka'i
- Pā'ia-Ha'ikū
- Wailuku-Kahului

For purposes of this Action Plan lower ranked risk categories will not be considered, given the nature of the disaster and probability rating for the identified hazards in the HMP, which are summarized in Table III-1 below.

Table III-1. Weighted Summary of Priority Risk Index (PRI)³⁹

Hazard		Category/Degree of Risk				
	Probability	Impact	Area Spread	Warning Time	Duration	PRI Score
High Windstorms	Highly Likely	Critical	Moderate	12 to 24 hours	Less than 24 hours	3.1
Flood	Highly Likely	Critical	Moderate	12 to 24 hours	Less than 24 hours	3.1
Coastal Erosion	Highly Likely	Critical	Moderate	More than 24 hours	More than 1 week	3
Wildfire	Likely	Critical	Moderate	12 to 24 hours	Less than 1 week	2.9
Drought	Highly Likely	Minor	Moderate	More than 24 hours	More than 1 week	2.6

³⁹ <https://www.mauicounty.gov/DocumentCenter/View/125977/2020-Maui-County-Hazard-Mitigation-Plan-Final>

Hurricane (including Tropical Storm and Kona Storm)	Likely	Catastrophic	Large	More than 24 hours	Less than 1 week	3.3
Tsunami	Likely	Critical	Moderate	Less than 6 hours	Less than 24 hours	3

The following information includes data provided in the County's HMP for the West Maui Community Planning Area that suffered the greatest direct impacts from the wildfires. This information includes the Hazard Vulnerability Index and incorporates the probability and impact for the identified hazards, based on information available at the time of the 2020 HMP, as summarized in Table III-2 below.

Table III-2. Summary of Weighted Highly Likely Hazard Results for West Maui

Hazard		Category/Degree of Risk				
	Probability	Impact	Area Spread	Warning Time	Duration	PRI Score
Wildfire	Highly Likely	Critical	Moderate	12 to 24 hours	Less than 1 week	3.2
High Windstorms	Highly Likely	Critical	Moderate	12 to 24 hours	Less than 24 hours	3.1
Flood	Highly Likely	Critical	Moderate	12 to 24 hours	Less than 24 hours	3.1
Coastal Erosion	Highly Likely	Limited	Moderate	More than 24 hours	More than 1 week	2.9
Extreme Heat	Highly Likely	Limited	Large	More than 24 hours	Less than 1 week	3
Drought	Highly Likely	Minor	Moderate	More than 24 hours	More than 1 week	2.6

Analysis of the Hazard Vulnerability Index, impact analysis for each of the 15 County identified hazards, and information provided by the HMP for each hazard resulted in high vulnerability throughout the entire County to Flood, High Windstorms, and Hurricanes. In West Maui the results were similar but the highly likely hazards that would have critical impact include wildfire and windstorms, both of which contributed directly to the 2023 wildfires.

[Wildfire](#)

A wildfire is any fire occurring in a wildland area (i.e. grassland, forest, brush land) except for prescribed fire in controlled environments. In Hawai‘i, more fires are typically seen during El Niño years, when conditions are typically warmer and drier. In addition, non-native, fire-prone grasses and shrubs fuel wildfires. Vegetated areas and steep slopes characterize much of the County. Wildfires are more common in leeward areas of the County rather than windward, as the trade winds bring moisture to windward areas.

Wildfire is a persistent issue in West Maui due to high winds, minimal rainfall, lack of water, and invasive grasses that are highly combustible. Since 1999, West Maui has experienced 28 wildfires, more than any other area in the County.⁴⁰ The Hazard Mitigation Plan Update analyzed data from the Department of Land and Natural Resources (DLNR). The data shows that wildfires occur annually in the County and can impact all community planning areas. However, West Maui has the highest prevalence of wildfire events.

Buildings and identified critical facilities, utility lines, roads and bridges in West Maui are at risk of damage from wildfires. When utility lines are damaged by wildfires, functionality of water, sewer, gas, and electricity systems may be compromised. Because of their geographic extent, roads and utility lines can have a greater chance of being impacted by wildfire events. Further, if any section of a road or utility line is damaged by a wildfire, the entire system may be impacted. For instance, a wildfire that results in one area of a road or a bridge being impassable may block accessibility to other roads or locations.

Wildfires, as evidence of this disaster, can cause a significant loss of life. Additional public health issues can occur from smoke. Smoke inhalation and increased particulate matter in the air can cause lung irritation and more severe respiratory problems especially for young children, the elderly, and individuals with asthma, emphysema, or other underlying respiratory issues.

⁴⁰ [2023-Wildfire-After-Action-Report](#) August 2023

Wildfires also can cause direct economic losses by destroying or damaging structures, utilities, roads and other critical assets, especially when high wind speeds aid in the distribution of embers that spark ignition. Average wind speeds in Hawai'i are highest during the summer when persistent trade winds blow in from the northeast at speeds of 10-25 mph; however, peak wind gusts of 67 mph were recorded on Maui during the 2023 Lahaina wildfire. Wildfires can also cause business interruptions, cause school closures, and divert flights. Tourism can be impacted by large wildfire events, especially in cases where historic and tourist attractions are destroyed or where infrastructure and businesses are impacted, which prevents the local community from being able to provide services and access for tourists and visitors.

Given that Wildfire is a highly likely hazard in West Maui with critical impact and a PRI Score of 3.2, planned CDBG-DR programs considered for funding under this Action Plan must account for this risk. Strategies to address this vulnerability include relocating adjacent infrastructure, potentially underground, to enhance the safety of evacuation routes.⁴¹

High Windstorm

High winds, including thunderstorm wind, can impact the entire County. The County is classified as a Zone II wind zone, capable of experiencing winds up to 160 miles per hour. While south-facing shorelines are at greatest risk to wind events, as well as the north shore on Maui as winds accelerate down the north slopes of Haleakalā, the nature of the islands and their climate means that most of the County receives high windstorms. Maui has the reputation of being the windiest island in the State with seasonal trade winds that average 15 to 30 mph (north-northeast direction) and Kona winds that average 10 to 20 mph (south-southeast direction).⁴²

Data is provided by the National Oceanic and Atmospheric Association's (NOAA) National Center for Environmental Information (NCEI) through a dedicated Storm Events Database⁴³ which is searchable by State, County, and Storm Type:

- Maui County experiences several significant high windstorm events per year, including those associated with storms (e.g., thunderstorms, Kona lows, tropical storms, and hurricanes) and trade winds.

⁴¹ Ibid.

⁴² County of Maui Hazard Mitigation Plan Update. August 2020.

⁴³ [Storm Events Database - Search Results | National Centers for Environmental Information](https://www.ncdc.noaa.gov/stormevents) at www.ncdc.noaa.gov



- Impacts include power outages, downed trees blocking roads, and damage to buildings (e.g., roofs being torn off).

From 1970 to 2019, the 2020 Maui County Hazard Mitigation Plan reported 94 high wind events, totaling almost \$6.6 million in damages. Current and future buildings in Maui County (including critical facilities) are considered at-risk to high wind events. High wind has the potential to blow shingles, siding, awnings, and other features off buildings. Falling trees and tree limbs can damage structures and block roadways. Objects picked up by wind can be hurled through the air, damaging structures and breaking windows when contact is made. In some cases, structures can be blown off foundations.

Severe winds can cause damage to critical infrastructure, including communications infrastructure, utility poles, and above ground power lines. Communication lines, antennas, and towers can suffer damage from wind and downed branches/trees. Damages to buildings, roads, and vehicles can be costly. Business interruptions can occur due to power outages during windstorms. Flights may be delayed or canceled due to severe wind events, resulting in impacts to the tourism industry.

Given that High Windstorm is a highly likely hazard in West Maui with critical impact and a PRI Score of 3.1, planned CDBG-DR programs considered for funding under this Action Plan must account for this risk. Strategies to address this vulnerability include retrofit of buildings and infrastructure to increase resilience to high-wind events, undergrounding or retrofit of utility lines adjacent to evacuation routes and ensuring that building codes adequately address high-wind events.⁴⁴

Flood

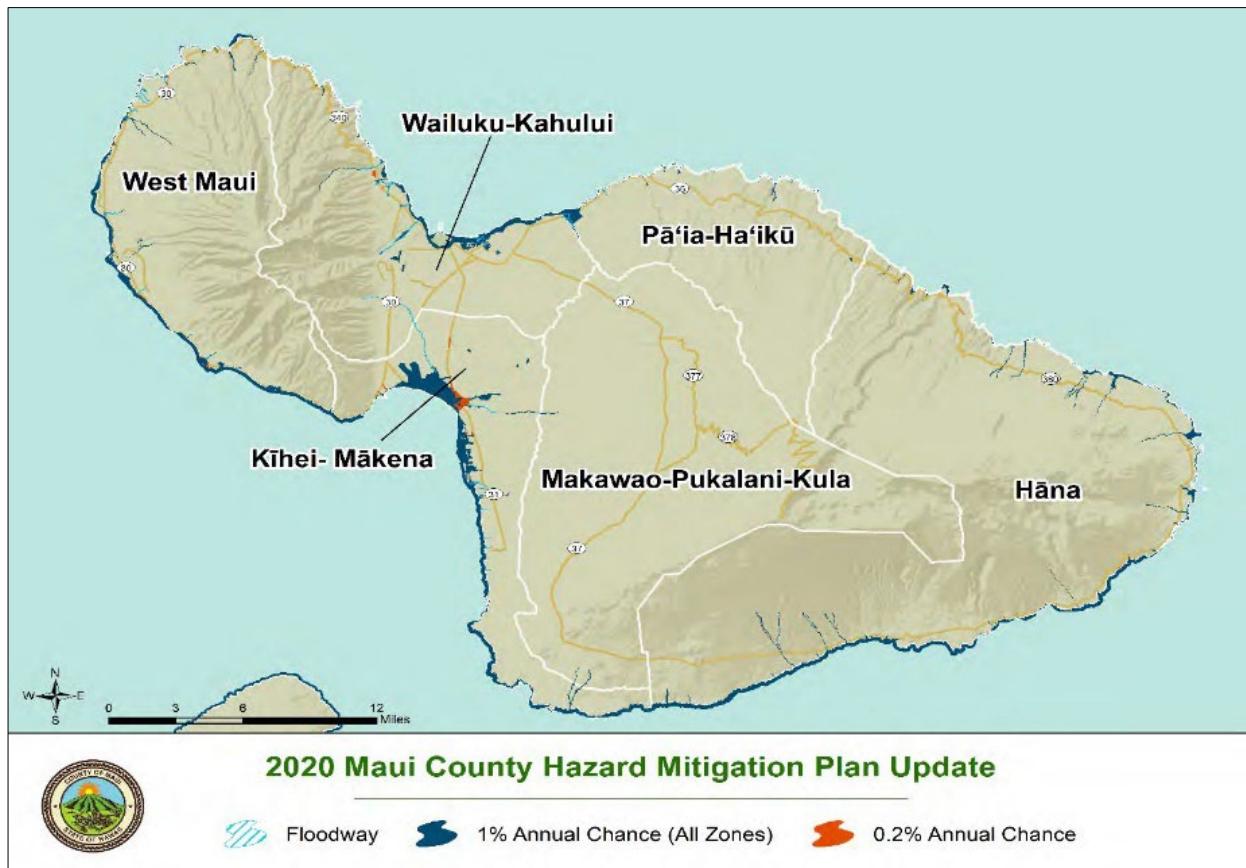
Based on historic events and expected future conditions, the flood hazard (both coastal and inland) was assigned a probability of highly likely (greater than 90% annual chance) in the County. From 1971 to 2020, 137 flood events were reported which resulted in two deaths and one injury. Descriptions for many events indicate that damages to buildings and infrastructure occurred, even when damage in dollars were not reported.

Inland flooding is caused by heavy rainfall, which can result in flash floods, sheet floods, urban floods and riverine floods. On Maui, heavy rains typically occur from October through April. Maui County's existing stormwater infrastructure is aging, and generally not equipped to handle current and future levels of stormwater runoff, especially as rainfall events intensify with climate

⁴⁴ Insurance Institute for Business & Home Safety. Lahaina: From Conflagration To Resilience. April 2024.

change and continued development adds impervious cover. Road closures due to flash flooding and flooding at gulches is common in the County, which includes the Honoapiilani Highway in West Maui.

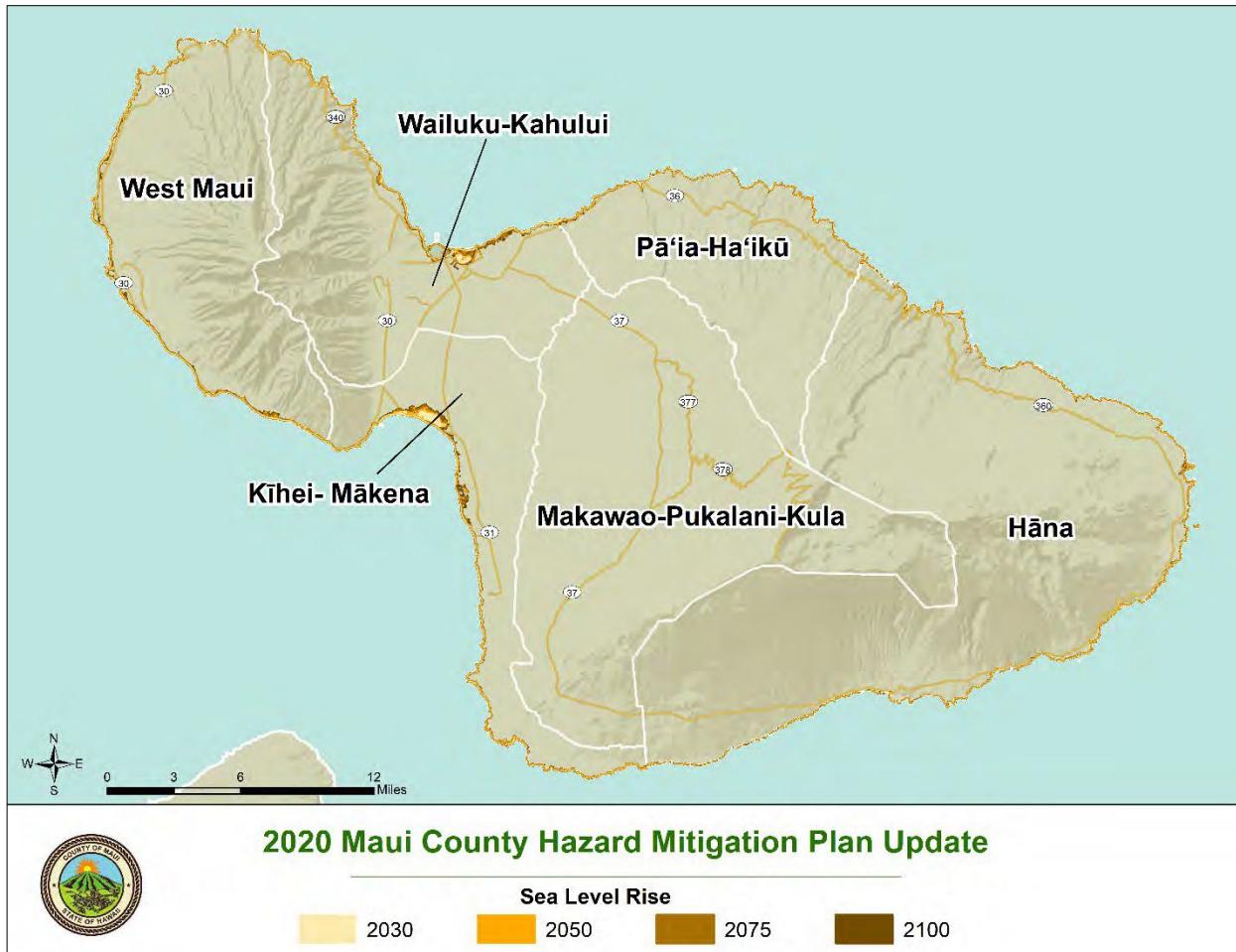
Figure III-1. Maui Coastal Flooding Risk Areas



Coastal flooding is caused by storm surges, high wave flooding, king tides and sea level rise. King tides are the highest tides of the year and tend to occur twice a year in conjunction with new moons and full moons. Coastal flooding occurs along all shorelines throughout the County. Coastal flooding contributes to saltwater intrusion into groundwater sources, stormwater infrastructure, and freshwater rivers and streams. Sea level rise contributes to coastal erosion and shoreline change. It also pushes high wave flooding and King Tide flooding farther inland.

According to NCEI, the County experienced over 550 high wave days in 16 years, averaging 16 days per year with high surf, but not all high wave events result in flood events. Similarly, the County experienced 16 recorded King Tide events in five years, averaging three events per year. Coastal flooding due to high waves and King Tides is expected to increase overtime as sea levels continue to rise with climate change.

Figure III-2. Maui Sea Level Rise Risk Areas



Roads in sea level rise hazards areas (based on data from PacIOOS) include Honoapi'ilani Highway near Lahaina, and HMP analysis identifies flooding as a risk to be considered for plans to mitigate risk in the County.

Given that Flooding is also a highly likely hazard in West Maui with critical impact and a PRI Score of 3.1, planned CDBG-DR programs must account for this risk.

Coastal Erosion

Erosion can be chronic or episodic, driven by storm surges, hurricanes, and high waves. Healthy shorelines recover over time, but significant events can cause inland retreat, damaging infrastructure. Global sea level rise accelerates coastal erosion. In the County, 85% of beaches are eroding compared to 70% statewide. Types of erosion in the County include beach erosion and dune erosion. Some shorelines on the island are more susceptible to erosion than others, such as beaches within the West Maui, Kihei-Makena, and Wailuku- Kahului community planning areas.

Several major roads in the County are within coastal erosion hazards areas, as many of Maui's highways hug the shoreline. For instance, in the West Maui community planning area, Honoapi'ilani Highway is within coastal erosion hazard areas south of Lahaina.

Additionally, coastal erosion can have negative impacts on tourism and the local economy and cause beachfront property values to decline as the beach is lost and the building itself becomes at risk of flooding or structural damage. Declining property values may impact the County's tax base. For example, West Maui has the greatest amount of exposure, with approximately 7% of all buildings, which compromise 23% of total estimated building value, located in the hazard area associated with the year 2100. By the year 2100, up to 7% of West Maui's buildings could be located in a flood hazard area. It should be noted that it is expected that the percentage of total building values at-risk to coastal erosion is higher than the percentage of total buildings at risk. This is because some of the most expensive buildings in the planning area (e.g., resorts, condominium buildings) are located along the beachfront. It is clear from the available data that sea level rise will continue to exacerbate rates of coastal erosion in the future, which impacts the communities in West Maui.

Given that Coastal Erosion is a highly likely hazard in West Maui with critical impact and a PRI Score of 2.9, planned CDBG-DR programs considered for funding under this Action Plan must account for these risks, ensuring that programs can continue to function despite any future disasters, while considering how to plan activities that will anticipate the impact of this identified risk.

2. Mitigation Needs Assessment and Risk Planning for Programs

This Mitigation Needs assessment of the high impact hazards for West Maui will contribute to the County's work in selecting Action Plan activities and programs that will be informed by data and risk information. Planned activities will need to anticipate hazards and build in a means to mitigate them when setting up CDBG-DR activities that can be funded to recover from the disaster. The selected programs and activities under the Action Plan will be structured to help reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property.

C. Mitigation Only Activity

The County will “incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or nonresidential structures with CDBG-DR funds,” as required under the Federal Register Notice. Infrastructure projects will also integrate features such as stormwater management systems to address flood and hurricane-related hazards—two of the most significant and consistent risks in the County. Additional mitigation components, including those embedded in public facility projects (non-infrastructure), will be described in the relevant project scopes.

A list of potential infrastructure projects has been developed based on criteria outlined in the Infrastructure Unmet Needs Assessment section of this Action Plan, using multiple data sources.

The selection methodology is detailed in the Grantee Program Use of Funds section. This process considered a wide range of projects, including those aligned with the County's local mitigation strategy, some with and some without a tie-back to the disaster. All selected projects are intended to increase community resilience.

The County also anticipates leveraging FEMA's Hazard Mitigation Grant Program (HMGP) for some projects, which requires a 25% non-federal match (estimated at \$15 million). CDBG-DR funds are eligible to serve as this match. Remaining mitigation funds will be incorporated into housing and infrastructure activities in accordance with the Federal Register Notice.

To support the effective delivery of these mitigation-focused projects, the County may allocate a portion of its Program Administrative Costs (PACs), as allowed under HUD's Universal Notice (March 2025) and Notice CPD-2023-06. These PACs will fund essential administrative functions—including staffing, procurement, and program oversight—required to plan, manage, and implement mitigation activities that reduce long-term disaster risk. All PAC use will remain within the 5% statutory cap and will directly support eligible recovery and mitigation activities identified in this Action Plan.

IV. CONNECTION OF PROPOSED PROGRAMS AND PROJECTS TO UNMET NEEDS AND MITIGATION NEEDS

Maui's geography, population make-up, and unique culture create complex challenges for disaster recovery, especially in Lahaina, where families have lived for generations and deep community ties shape daily life. Limited land availability, a high living costs, and dependence on imported goods and materials make it difficult for residents to relocate or return home. Recovery must prioritize solutions that support Lahaina's long-standing community in rebuilding and returning, not only to restore housing but to safeguard the cultural identity and close-knit social fabric that make Lahaina irreplaceable. The County is committed to listening to the community's voice and responding to the urgent need to help Lahaina return home by rebuilding in a way that strengthens resilience through safer housing, hardened infrastructure, and long-term mitigation against future disasters.

Based on the unmet needs analyses conducted for housing, infrastructure/public facilities, economic development, and public services outlined above, there is a total estimated recovery need in the County of almost \$7 billion dollars, as shown in Table IV-1. Due to the substantial impact to housing and the corresponding unmet need, housing is the area of greatest concern for the County, as more than 5,000 units have been affected. The County will implement four separate programs to address the housing impacts from the Maui Wildfires.

The County's plans for meeting unmet housing needs in this CDBG-DR Action Plan include the following:

- Single-Family Reconstruction
- Multifamily Rental Housing Reconstruction

- Multifamily Rental Housing New Construction
- Single-Family New Construction
 - First-Time Homebuyer Opportunity

The housing projects/programs seek to address the housing needs of low- income, moderate-income, and households with limited access to resources as much as possible.

Lahaina's economy is heavily driven by tourism, but it fundamentally relies on the local workforce, many of whom were displaced by the fires. Funding is primarily directed toward housing and infrastructure to help stabilize the community because these investments lay the foundation for long-term economic revitalization, one of the most significant areas of unmet need. Restoring housing enables residents to return and remain in their community, while infrastructure repairs ensure access to critical services, utilities, and transportation networks. Together, these efforts not only support the return of the workforce but also create the conditions necessary for small businesses to reopen, tourism to recover, and essential economic activity to resume in a sustainable and resilient way.

The County's allocations to housing, infrastructure, economic revitalization, and public services are informed by data and assessments, and outlined in Table IV-1. These efforts will prioritize benefiting individuals with low- and moderate-income.

Table IV-1. CDBG-DR Funds Proposed Allocation

Eligible Cost Category	Estimated Unmet Need	CDBG-DR Allocation Amount	% of Unmet Need	% of CDBG-DR Allocation	Estimated % to LMI
Administration	N/A	\$ 81,969,050.00	N/A	5.0%	N/A
Housing	\$ 2,427,723,167.00	\$ 903,579,950.00	35%	55.1%	70%
CDBG-DR Mitigation Set-Aside	N/A	\$ 213,832,000.00	N/A	13.0%	70%
Economic Revitalization	\$ 2,422,500,000.00	\$ 15,000,000.00	35%	0.9%	70%
Infrastructure	\$ 1,932,225,151.77	\$ 400,000,000.00	28%	24.4%	70%
Public Services	\$ 105,000,000.00	\$ 25,000,000.00	2%	1.5%	70%
Total	\$ 6,887,448,318.77	\$ 1,639,381,000.00		100%	70%
% of Total	100%	100%		100%	70%

Connection Between Assessments and Proposed Programs and Projects in the MID Areas

Because the County of Maui is the MID Area identified by HUD, all planned programs and projects selected by the County for funding using CDBG-DR will be addressing populations within the MID Area. The County's recovery funding strategy within this Action Plan aligns with federal assistance funding, taking advantage of complimentary programs to maximize recovery dollars and overcome impediments that may hinder recovery for residents affected by the Maui Wildfires.

For CDBG-DR funding, the Action Plan must establish the connection between the disaster's impact on the County and its unmet needs assessment in selecting programs and projects to be conducted in the MID Area. Unmet needs exist in the MID Area in Housing, Infrastructure, Economic Revitalization, and Public Services. The defined programs and projects outlined within this Action Plan are structured to address those needs, primarily through funding Housing programs and to a lesser extent Infrastructure, with smaller allocations to address needs for Economic Revitalization and Public Services, as outlined in Table IV-1 above.

To comply with the requirements in Appendices A and B of HUD's Universal Notice (March 2025), the County will collect and analyze data as required to ensure adherence to applicable nondiscrimination laws. These data will inform program design, outreach, and access strategies. The County's data collection practices will also support HUD's assessment of administrative capacity, financial controls, and procurement systems, as required for certification and ongoing monitoring.

A. Hazard Mitigation Measures

The County has been working with Hawai'i Emergency Management Agency in identifying potential HMGP eligible projects which will be submitted to FEMA. This has resulted in the identification of seven projects costing approximately \$292 million. These projects were thoroughly considered and reviewed for their ability to help substantially mitigate impacts of future disasters and increase resilience against the most likely and severe hazards which threaten the County. Because FEMA's HMGP funds require a 25% local match the County anticipates needing to provide approximately \$15 million in matching funds. This amount represents the County's Mitigation Unmet Need.

The County plans to incorporate mitigation measures throughout all programs. Mitigation measures include, but are not limited to, consideration of the following:

- Flood Mitigation
 - Storm proofing and elevating buildings as required.
 - Using flood-resistant materials for walls, insulation, and flooring.
 - Installing drainage systems to prevent water damage.
- Fire Mitigation
 - Constructing buildings with fire-resistant materials (non-combustible siding, roofing, decks).
 - Installing ember-resistant vents and fire suppression systems.
 - Creating defensible space with landscaping and firebreaks.
 - Integrating on-site fire alarm and emergency notification systems.
- Site Design and Parking Resilience
 - Designing adequate off-street parking in accordance with local code to reduce street congestion and support emergency access.

- Avoiding overbuilt density on parcels that cannot support required parking or emergency vehicle maneuverability.
- Service Continuity and Disaster Preparedness
 - Support emergency response planning for healthcare, workforce, and homelessness services.
 - Fund resilient public service delivery models, including telehealth, mobile outreach, and emergency case management.
 - Establish disaster contingency plans for elderly (Kupuna) services and mental health providers

B. Impacts on Households with Unmet Needs

All programs and projects within this Action Plan were developed and considered by taking all individuals in the community into account. Those populations who may be at the greatest risk, may require additional services, or have additional obstacles and concerns to overcome were provided with additional analysis to possibly identify any disproportionate impacts or needs. Based on the impact assessment and analysis of available demographic and population-specific data, no group was identified as having experienced disproportionate disaster impacts relative to the general population. For instance, homeless shelters are already engaged in recovery, and any CDBG-DR assistance would serve only as gap funding. In accordance with federal requirements, the County will continue to evaluate any additional unmet needs that arise during the identification and planning of infrastructure and public facility projects. Should such needs be identified, they will be incorporated into project development and prioritization to ensure equitable access to recovery resources.

C. Displacement

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, the County will coordinate with appropriate local agencies including but not limited to landlord associations, human services organizations, and other applicable resources to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

The County and any subrecipients will coordinate with applicable agencies and entities to ensure that programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24), and Section 104(d) of the Housing and Community Development Act of 1974, as amended, while also implementing regulations at 24 CFR Part 570.496(a).

The County will provide detailed policies and procedures for proposed programs or projects that could potentially cause the displacement of people or other entities, and the County will follow

their amended Residential Anti-displacement and Relocation Assistance Plan (RARAP) in accordance with URA requirements. CDBG-DR funds will not be used to support any federal, state, or local projects that seek to use the power of eminent domain unless eminent domain is employed only for public use.

The County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

The proposed programs in this Action Plan will address displacement due to the disaster by providing new housing opportunities in compliance with the URA requirements.

V. ALLOCATION, AWARD CAPS, AND FUNDING CRITERIA

Under CDBG-DR requirements, each funded program, excluding Administration and Planning, must include specific details about how funds will be used. This includes eligibility criteria, funding amounts, program design, and compliance with applicable federal requirements. All required information is included in the description of each program in the following sections of the Action Plan, in alignment with HUD guidelines.

A. Funding Criteria

The County will allocate CDBG-DR funds through a combination of direct implementation and agreements with eligible subrecipients, as defined under 24 CFR 570.500(c), and contractors procured in accordance with federal procurement standards. For each program, the County will establish clear selection criteria and funding thresholds, as outlined in the applicable program guidelines.

All funded activities must:

- Comply with a CDBG-DR national objective (e.g., Low- and Moderate-Income Benefit or Urgent Need),
- Qualify as an eligible activity under Title I of the Housing and Community Development Act of 1974, as modified by the Universal Notice and applicable waivers and alternative requirements,
- And be tied to an identified unmet need or mitigation need described in this Action Plan.

The County will prioritize funding for activities that incorporate hazard mitigation measures or directly support long-term recovery and resilience in the most impacted and distressed (MID) areas. Maximum grant amounts and specific eligibility thresholds will be set at the program level and published on the County's official CDBG-DR website.

All funding decisions will be made in a manner that promotes transparency, consistency, and alignment with HUD requirements, and will follow the citizen participation plan as required under the Universal Notice.

B. General Exception Criteria

The County may approve exceptions to maximum award amounts or program eligibility criteria to comply with federal accessibility standards or to reasonably accommodate a person with a disability. The County will include exception policies and procedures in applicable program guidelines and will make this information available on its official CDBG-DR website.

C. Administration

The County will allocate up to 5% of its total CDBG-DR grant, plus up to 5% of any program income, for administrative costs (Universal Notice, Section III.B.3). These funds will support the management, oversight, reporting, and compliance activities necessary to implement and monitor all CDBG-DR programs in accordance with HUD requirements. The County has published its HUD approved Administrative Action Plan on the CDBG-DR website.

Table V-1. Grantee Administration Activity(ies) Overview

Eligible Category	Cost	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:		\$81,969,050.00	5%
Total		\$81,969,050.00	5%

D. Housing

According to the U.S. Census Bureau, the "Median Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars)" for Lahaina, Maui is \$95,322.00. Census data reflects that 52% of residents qualify as Low- and Moderate-Income (LMI) and are eligible for various CDBG-DR recovery programs⁴⁵. However, the remaining 48% of residents earn more than 80% of the Area Median Income (AMI) and do not qualify for many low-income assistance programs for home

⁴⁵https://data.census.gov/table?q=income%20data%20sets%20for%2096761%20average%20household%20income&t=Income%20and%20Poverty&g=040XX00US15_060XX00US1500991980&y=2023

reconstruction following the Maui Wildfires. These households may be underinsured, face insurance gaps, or have rebuilding costs that far exceed their available resources, leaving them in urgent need of assistance to avoid prolonged displacement.

While middle-income households are often excluded from most disaster recovery programs, the Urgent Need (UN) National Objective within the CDBG-DR framework ensures that critical funding can still reach households that face significant financial impediments to reconstruction. Without this assistance, these families risk being unable to rebuild, leading to permanent displacement, workforce disruptions, and negative economic impacts on the broader community. While the County will prioritize the Low- and Moderate-Income (LMI) National Objective, the use of Urgent Need remains essential to provide timely assistance for all eligible applicants, as permitted under HUD's Universal Notice (90 FR 1754, January 8, 2025).⁴⁶ The Universal Notice waives the requirement for a separate waiver request to utilize Urgent Need, allowing for direct implementation under this objective. The County of Maui will continue to assess and transition projects toward LMI compliance where feasible, but Urgent Need remains essential to accelerate housing recovery, support middle-income homeowners, and prevent further displacement.

Connecting the Urgent Need National Objective to Households Earning More Than 80% AMI:

Urgent Need: Under the CDBG-DR program, projects can qualify under the Urgent Need (UN) National Objective when the community faces a disaster-related problem that requires immediate resolution, which is the case for many middle-income households. These families need reconstruction assistance to rebuild their homes quickly to avoid extended displacement, economic disruption, and workforce destabilization.

Program Eligibility: The County will apply the Urgent Need national objective to support reconstruction assistance for households above 80% AMI who are otherwise ineligible under the Low- and Moderate-Income (LMI) national objective. Assistance will be limited to households who meet all CDBG-DR program criteria and where documentation supports that the activity addresses an urgent, disaster-related condition that poses a direct threat to the household's health, safety, or ability to remain in the community.

Rationale: By applying the Urgent Need National Objective to these households, the program would help to meet the critical need for safe, habitable housing for families who cannot otherwise access recovery resources needed after the Maui Wildfires.

⁴⁶<https://www.hud.gov/sites/dfiles/CPD/documents/CDBG-DR/Universal-Notice-CDBG-DR-Signed-English.pdf>



Threshold Requirement: In accordance with the Universal Notice, the County will only apply the Urgent Need national objective for assistance to households above 80% AMI after at least 70% of the total grant award has been budgeted for activities that benefit low- and moderate-income (LMI) persons.

1. Program: Single-Family Homeowner Reconstruction Program

The Single-Family Homeowner Reconstruction Program is designed for homeowners, or their surviving heirs, whose primary residences were destroyed by the Maui Wildfires. The program will rebuild homes for eligible households up to 140% AMI, in compliance with HUD requirements.

Key features include:

- Pre-approved home designs to expedite permitting
- Construction warranty
- Sustainability and resilience through energy-efficient designs and adherence to flood/fire mitigation standards.
- Assistance will be coordinated with other sources of recovery funding. The program will cover the gap between verified recovery resources and the eligible cost to rebuild (e.g., Insurance is treated as a duplication of benefits (DOB). For insured applicants, the program will cover the gap between financial resources, such as but not limited to, insurance proceeds and the eligible reconstruction cost).

Allocation Amount	\$298,579,950.00
Eligible Activities	<p>24 CFR 570.201(c)</p> <ul style="list-style-type: none">• Section 105 (a) (4) –Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements<ul style="list-style-type: none">○ Note: The primary purpose of this program is the reconstruction of homes destroyed in the 2023 Maui Wildfires and the augmentation or conversion of FEMA modular units placed on homeowner properties, where feasible. The program is not intended for minor repair or rehabilitation of partially damaged homes.• Section 105 (a) (15) – Assistance to Eligible Entities for Neighborhood Revitalization, Community Economic Development, and Energy Conservation• Section 105 (a) (26) - Lead-based paint hazard evaluation and reduction• Section 105(a)(8) – Public Service (Title Clearance)

	<ul style="list-style-type: none"> Section 105(a)(20) – Housing Counseling <p>Other Intended Use of Funds:</p> <ul style="list-style-type: none"> Permitting support - to support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays. <p>All activities must meet environmental review standards and regulatory thresholds.</p>																																													
Eligible Applicants	Lahaina homeowners with incomes up to 140% AMI whose properties were destroyed by the wildfires																																													
Intended Beneficiaries, Requirements, and Prioritization	<p>The eligible applicant is also the intended beneficiary. Eligible homes will be rebuilt through a phased application process, subject to funding availability.</p> <table border="1" data-bbox="481 1024 1395 1446"> <thead> <tr> <th colspan="2">Award Phases</th> <th>Phase I</th> <th>Phase II</th> <th>Phase III</th> <th>Phase IV</th> <th>Phase V</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="writing-mode: vertical-rl; transform: rotate(180deg);">Household Income</td> <td>Less than 50% AMI</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Between 50% and 80% AMI</td> <td></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Between 80% and 120% AMI*</td> <td></td> <td></td> <td></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Between 120% and 140% AMI*</td> <td></td> <td></td> <td></td> <td></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td rowspan="2" style="writing-mode: vertical-rl; transform: rotate(180deg);">Household Members under 18, over 62 and/or with a Disability</td> <td>Yes</td> <td></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>No</td> <td></td> <td></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </tbody> </table> <ul style="list-style-type: none"> The property must have been the applicant's primary residence at the time of the wildfire, and after reconstruction. Proof of ownership at the time of disaster or legal transfer of title to heir must be provided. The home must have been destroyed as a result of the wildfire. Properties in Special Flood Hazard Areas (SFHA) must comply with elevation requirements and maintain flood insurance. Second homes are not eligible. Reconstruction based on the last permitted square footage or to 	Award Phases		Phase I	Phase II	Phase III	Phase IV	Phase V	Household Income	Less than 50% AMI	<input checked="" type="checkbox"/>	Between 50% and 80% AMI		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Between 80% and 120% AMI*				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Between 120% and 140% AMI*					<input checked="" type="checkbox"/>	Household Members under 18, over 62 and/or with a Disability	Yes		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	No			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
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	<p>meet the needs of the household as allowable.</p>
Lead Agency and Delivery Model	<ul style="list-style-type: none"> • The County of Maui will oversee the program, ensuring compliance with HUD regulations and federal procurement standards. • An implementation vendor will manage daily operations, subcontractor procurement, intake and eligibility, reconstruction oversight, homeowner coordination, and HUD compliance. • The construction manager will be responsible for the design, permitting, inspections, and building of the homes. <p>Performance and Monitoring</p> <p>The County will monitor housing program performance through quarterly reporting from implementing partners or subrecipients. Key performance metrics will include the number of housing units completed, funds disbursed, households assisted, and percentage of assistance benefiting low- and moderate-income (LMI) households.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including eligibility verification, affordability standards, duplication of benefits (DOB) compliance, and timely expenditure of funds. Projects that fail to meet performance benchmarks or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.</p>
National Objective	<p>LMI, LMH and UN</p> <p><i>Urgent Need (UN) National Objective – Assistance for households above 80% AMI when addressing serious and immediate threats to health, safety, and community stability.</i></p> <ul style="list-style-type: none"> • Use of the urgent need national objective is based on HUD's waiver and alternative criteria under Section III.B.2 of the Universal Notice. This program directly addresses urgent conditions identified in the County's unmet needs assessment, including prolonged displacement, lack of accessible housing for kupuna and caregivers, and increased risk of homelessness, substance use, and domestic violence.

Responsible Entity for Environmental Review	Maui County
Geographic Areas	While Maui County is the MID, as identified by the Universal Notice, priority will be given to those properties in, or closest to, the burn scar.
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.
Maximum Assistance	\$1,200,000.00
Process for Exceptions	<ol style="list-style-type: none"> 1. Applicants should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>
Selection Criteria	See the Intended Beneficiaries, Requirements, and Prioritization section above.
Max Grant Size	The County does not intend to subgrant funds under this program.
Unmet need tie back or mitigation needs	The program assists to reconstruct homes that were destroyed as a direct result of the Maui Wildfires.
Citizen Participation	The program is open to all eligible disaster impacted homeowners, or their heirs. Outreach will include media campaigns and targeted strategies to ensure that displaced households, including those who have relocated off-island, receive timely and accurate program information. The County will coordinate with other disaster-related case management entities to facilitate program participation for displaced individuals and households.
Other Program Considerations	<p>Reimbursement Option:</p> <p>A reimbursement option may be offered, subject to funding availability,</p>

after priority unmet needs have been addressed. Reimbursement may be available to eligible homeowners who initiated reconstruction after the disaster but prior to enrolling in the program. All applicable CDBG-DR requirements, including environmental review compliance, must be met.

Assistance will be capped at the amount deemed reasonable by a standardized cost estimation tool (e.g., Xactimate or similar), or \$400,000.00, whichever is less. Homeowners may elect to use higher-end materials or upgrades at their own expense; however, the program will not reimburse any costs beyond HUD's determination of reasonable reimbursement amount.

Applicants seeking reimbursement will be required to submit sufficient documentation to verify costs and eligibility, including but not limited to building permits, contractor invoices, receipts, and proof of payment. This documentation will also be used to ensure compliance with duplication of benefits (DOB) requirements and to confirm that reimbursed expenses have not been covered by other sources, such as, but not limited to, insurance, FEMA, or SBA. All applicants receiving reimbursement will be required to sign a subrogation agreement, committing to repay any duplicative assistance received after the disbursement of CDBG-DR funds.

Applicants seeking reimbursement must also meet the program's phased prioritization criteria, including eligibility based on household income and other applicable thresholds. Reimbursement assistance will only be provided to applicants who fall within the current eligible phase of program implementation at the time of review.

Modular Units

The County is exploring the repurposing of modular units currently on island, to utilize on eligible homeowner properties, provided the units are brought into compliance with local building codes and permanently affixed.

All activities will comply with HUD eligibility criteria, meet a CDBG-DR national objective, and ensure long-term use restrictions where required.

2. Program: Multifamily Rental Housing Reconstruction

The Multifamily Rental Housing Reconstruction Program is designed to provide gap funding in the form of a subsidy or a loan to support infrastructure or the reconstruction of affordable multifamily rental units (5 or more units) that were destroyed by the Maui Wildfires.

This program is not designed to fund displaced households directly, but rather to support the reconstruction of affordable rental housing developments in addressing unmet funding needs. Funds will supplement other sources such as, but not limited to, insurance proceeds, FEMA Public Assistance, and tax credit equity to ensure that projects are financially viable and can proceed to construction. All developments must meet long-term affordability requirements and comply with federal standards for disaster recovery, resilience, and sustainability. The completed developments will provide long-term affordable rental housing for income-eligible households.

Allocation Amount	\$235,000,000.00 Target number of units: 634
Eligible Activities	<p>24 CFR 570.201(c),(g), 24 CFR 570.202</p> <ul style="list-style-type: none">Section 105(a)(4) – Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements 26 U.S.C. § 42, Low-Income Housing CreditSection 105 (a) (9) – Payment of Non-Federal Share (FEMA Public Assistance 10% Non-Federal Cost Share)Section 105(a)(18) – Development of Housing <p>Other Intended Use of Funds:</p> <ul style="list-style-type: none">Permitting support - to support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays. <p>All activities must meet environmental review standards and regulatory thresholds.</p>
Eligible Applicants	<ul style="list-style-type: none">For-profit developers/ borrowersPublic housing authoritiesNot-for-profit developers/ borrowersOwners of Section 8 properties
Intended	<ul style="list-style-type: none">Households who meet LMI criteria (up to 80% AMI) must occupy

Beneficiaries, Requirements, and Prioritization	<p>a minimum of 51% of the constructed units.</p> <ul style="list-style-type: none"> • Beneficiaries must occupy units as their primary residence <p>Tenant Prioritization:</p> <p>To the extent feasible, the County encourages its subrecipients and development partners to implement tenant selection preferences that prioritize households displaced by the Maui Wildfires, particularly former renters of lost or damaged units in Lahaina. Final tenant selection policies and procedures will be developed and reviewed by the County of Maui, and administered by the subrecipient in accordance with applicable laws, regulations, and CDBG-DR program requirements.</p>
Lead Agency and Delivery Model	<ul style="list-style-type: none"> • The County of Maui will oversee the program, ensuring compliance with HUD regulations and federal procurement standards. • A contracted vendor will manage daily operations, including procurement, reconstruction oversight, homeowner coordination, and HUD compliance. • The contracted vendor will be responsible for the design, permitting, inspections, and building of the project. <p>Performance and Monitoring</p> <p>The County will monitor housing program performance through quarterly reporting from implementing partners or subrecipients. Key performance metrics will include the number of housing units completed, funds disbursed, households assisted, and percentage of assistance benefiting low- and moderate-income (LMI) households.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including eligibility verification, affordability standards, duplication of benefits (DOB) compliance, and timely expenditure of funds. Projects that fail to meet performance benchmarks or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.</p>
National Objective	LMI, LMH, and LMC
Responsible Entity	Maui County

for Environmental Review															
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.														
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.														
Maximum Assistance	\$70,000,000.00 per project; \$400,000.00 per unit														
Process for Exceptions	<p>Not applicable to this program.</p> <p>Exceptions for tenants will be managed through the subrecipient and monitored for HUD compliance by Maui County.</p>														
Selection Criteria	<p>Projects will be selected using the following criteria:</p> <table border="1"> <thead> <tr> <th>Criteria</th> <th>Weight</th> </tr> </thead> <tbody> <tr> <td>Alignment with Identified Recovery Needs</td> <td>25%</td> </tr> <tr> <td>Population Served</td> <td>25%</td> </tr> <tr> <td>Project Impact</td> <td>20%</td> </tr> <tr> <td>Financial Considerations</td> <td>15%</td> </tr> <tr> <td>Applicant Attributes and Readiness to Launch</td> <td>15%</td> </tr> <tr> <td>TOTAL</td> <td>100%</td> </tr> </tbody> </table> <p>CDBG-DR funds may be used to provide the required non-federal match for FEMA Public Assistance (PA) eligible activities. All coordination will comply with FEMA and HUD regulations, including duplication of benefits and cost reasonableness requirements.</p>	Criteria	Weight	Alignment with Identified Recovery Needs	25%	Population Served	25%	Project Impact	20%	Financial Considerations	15%	Applicant Attributes and Readiness to Launch	15%	TOTAL	100%
Criteria	Weight														
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Population Served	25%														
Project Impact	20%														
Financial Considerations	15%														
Applicant Attributes and Readiness to Launch	15%														
TOTAL	100%														
Max Grant Size	The County does not intend to subgrant funds under this program.														

Unmet need tie back or mitigation needs	Reconstructs affordable rental housing damaged or lost due to the wildfires
Citizen Participation	Outreach will include media campaigns and targeted strategies to ensure that displaced households, including those who have relocated off-island, receive timely and accurate program information. The County will coordinate with other disaster-related case management entities to facilitate program participation for displaced individuals and households.
Other Program Considerations	<ul style="list-style-type: none"> • Maintain a minimum 20-year affordability period. • 51% of units must serve LMI households • Must have exhausted all available funding options

3. Program: Multifamily Rental Housing New Construction

The Multifamily New Construction Program provides funding to support the development of new multifamily rental housing across Maui County. The goal is to increase the long-term supply of resilient, affordable rental units, especially for households impacted by the Maui Wildfires. The completed developments will provide long-term affordable rental housing for income-eligible households.

Gap funding may be provided in the form of a subsidy or a loan, and may be used for land acquisition, infrastructure development, and/or construction. The County will prioritize shovel-ready projects with entitlements and may co-locate multifamily housing with other developments to maximize infrastructure and community benefit. All units must meet modern safety, energy, and disaster-resilient standards, with a required affordability period of no less than 20 years.

Allocation Amount	\$185,000,000.00 Target number of units: 370
Eligible Activities	<p>24 CFR 570.201(c), 24 CFR 570.202, and the applicable waivers and alternative requirements published in HUD's CDBG-DR Universal Notice (FR-6489-N-01)</p> <ul style="list-style-type: none"> • Section 105(a)(1) – Acquisition • Section 105 (a) (2) – Public Facilities and Improvements (except for buildings for the general conduct of government) • Section 105 (a) (4) – Clearance, demolition, removal,

	<p>reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements</p> <ul style="list-style-type: none"> • Section 105(a)(18) – Development of Housing <p>Other Intended Use of Funds:</p> <ul style="list-style-type: none"> • Permitting support - to support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays. <p>All activities must meet environmental review standards and regulatory thresholds.</p>
Eligible Applicants	<ul style="list-style-type: none"> • For-profit developers/ borrowers • Not-for-profit developers/ borrowers • Public housing authorities • Owners of Section 8 properties
Intended Beneficiaries, Requirements, and Prioritization	<ul style="list-style-type: none"> • Households who meet LMI criteria (up to 80% AMI) must occupy a minimum of 51% of the constructed units. • Applicants must occupy units as their primary residence <p>Tenant Prioritization:</p> <p>To the extent feasible, the County encourages its subrecipients and development partners to implement tenant selection preferences that prioritize households displaced by the Maui Wildfires, particularly former renters of lost or damaged units in Lahaina. Final tenant selection policies and procedures will be developed and administered by the subrecipient in accordance with applicable laws, regulations, and CDBG-DR program requirements.</p>
Lead Agency and Delivery Model	<ul style="list-style-type: none"> • The County of Maui will oversee the program, ensuring compliance with HUD regulations and federal procurement standards. • A contracted vendor will manage daily operations, including procurement, reconstruction oversight, homeowner coordination, and HUD compliance. • The contracted vendor will be responsible for the design, permitting, inspections, and building of the project.

<h2>Performance and Monitoring</h2> <p>The County will monitor housing program performance through quarterly reporting from implementing partners or subrecipients. Key performance metrics will include the number of housing units completed, funds disbursed, households assisted, and percentage of assistance benefiting low- and moderate-income (LMI) households.</p>	
<p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including eligibility verification, affordability standards, duplication of benefits (DOB) compliance, and timely expenditure of funds. Projects that fail to meet performance benchmarks or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.</p>	
National Objective	LMI, LMH, and LMC
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program. Projects must comply with Uniform Federal Accessibility Standards (UFAS) accessibility requirements.
Maximum Assistance	\$70,000,000.00 per project; \$400,000.00 per unit
Process for Exceptions	<ol style="list-style-type: none"> Developers should submit a written request that includes documentation of need. Program staff will review request with the Special Considerations Panel. Program staff will provide applicant with written decision within

	<p>timeframe specified in policies and procedures.</p> <p>All approved exceptions will be tracked for compliance purposes.</p>														
Selection Criteria	<p>The County will conduct targeted outreach to qualified developers, including those with experience delivering affordable housing using tax credits or federal funds. The program will prioritize projects that have already received entitlements to expedite the permitting process and reduce construction delays.</p> <p>Projects will be selected using the following criteria:</p> <table border="1"> <thead> <tr> <th>Criteria</th><th>Weight</th></tr> </thead> <tbody> <tr> <td>Alignment with Identified Recovery Needs</td><td>25%</td></tr> <tr> <td>Population Served</td><td>25%</td></tr> <tr> <td>Project Impact</td><td>20%</td></tr> <tr> <td>Financial Considerations</td><td>15%</td></tr> <tr> <td>Applicant Attributes and Readiness to Launch</td><td>15%</td></tr> <tr> <td>TOTAL</td><td>100%</td></tr> </tbody> </table>	Criteria	Weight	Alignment with Identified Recovery Needs	25%	Population Served	25%	Project Impact	20%	Financial Considerations	15%	Applicant Attributes and Readiness to Launch	15%	TOTAL	100%
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Applicant Attributes and Readiness to Launch	15%														
TOTAL	100%														
Max Grant Size	For multifamily new construction projects, CDBG-DR funds will be provided as assistance, which may cover up to 100% of eligible development costs, subject to underwriting and applicable program requirements.														
Unmet need tie back or mitigation needs	Expands affordable rental housing in response to wildfire-driven displacement and housing shortages														
Citizen Participation	Outreach will include media campaigns and targeted strategies to ensure that displaced households receive timely and accurate program information. The County will coordinate with other disaster-related case management entities to facilitate program participation for displaced individuals and households.														

Other Program Considerations	<ul style="list-style-type: none"> • Maintain a minimum 20-year affordability period • Solar and energy-efficiency features are strongly encouraged
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4a. Program: Single-Family New Construction

The Single-Family New Construction and First-Time Homebuyer Programs outlined in this section may be implemented either as an integrated program or as separate initiatives, depending on project feasibility and construction costs.

The Single-Family New Construction Program provides funds to acquire and/or develop turnkey, affordable homes for first-time homebuyers or leaseholders earning up to 120% of the Area Median Income (AMI). The County will provide funds to developers, as defined in eligible applicants, for projects in the form of a subsidy or loan. Affordable housing units may be developed on lands that include, but is not limited to, County acquired/ owned land, or long-term land stewardship models. Homes will be constructed and sold at affordable prices to eligible households. To ensure long-term affordability, the County will evaluate project proposals for cost reasonableness and may subsidize infrastructure or construction materials as needed.

For this program, the County will recoup all or a portion of the CDBG-DR subsidy provided to the homebuyer(s)/leaseholder(s) if the unit ceases to be the principal residence of the homebuyer(s)/leaseholder(s) during the required affordability period.

All subsidy amounts that directly benefit the homebuyer are subject to recapture, including development subsidies used to reduce the sales price below market. The affordability period and recapture terms will be defined in a written agreement and recorded in the property title.

Allocation Amount	<p>\$92,500,000.00</p> <p>Target number of homes: 115</p>
Eligible Activities	<p>24 CFR 570.201(m), 24 CFR 570.202, and the applicable waivers and alternative requirements published in HUD's CDBG-DR Universal Notice (FR-6489-N-01).</p> <ul style="list-style-type: none"> • Section 105(a)(1) – Acquisition • Section 105 (a) (4) –Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements • Section 105 (a) (7) – Disposition • Section 105 (a) (11) – Relocation • Section 105 (a) (14) – Provision of assistance with loans

	<ul style="list-style-type: none"> Section 105 (a) (15) – Assistance to neighborhood-based nonprofit organizations, local development corporations, nonprofit organizations serving the development needs of the communities in non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 <p>Other Intended Use of Funds:</p> <ul style="list-style-type: none"> Permitting support - to support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays. <p>All activities must meet environmental review standards and regulatory thresholds.</p>
Eligible Applicants	<ul style="list-style-type: none"> For-profit developers/ borrowers Not-for-profit developers/ borrowers Community-Based Organizations
Intended Beneficiaries, Requirements, and Prioritization	<p>Eligible homeowner applicants must:</p> <ul style="list-style-type: none"> Be first-time homebuyers (Defined as an individual or household who has not owned a home during the three years prior to the purchase of a home with HUD assistance) Occupy the home as their primary residence Be able to secure a mortgage Complete HUD-certified housing counseling <p>Priority will be given to:</p> <ul style="list-style-type: none"> Disaster-impacted renters Households that meet LMI criteria <p>The program prioritizes first-time homebuyers with incomes up to 80% AMI to meet LMI national objectives but may allow participation by households up to 120% AMI using the urgent need or unmet need eligibility criteria where applicable.</p>
Lead Agency and Delivery Model	<ul style="list-style-type: none"> The County of Maui will oversee the program, ensuring compliance with HUD regulations and federal procurement standards.

- An implementation vendor will manage daily operations, subcontractor procurement, intake and eligibility, construction oversight, homeowner coordination, and HUD compliance.
- The construction manager will be responsible for the design, permitting, inspections, and building of the homes.

Performance and Monitoring

The County will monitor housing program performance through quarterly reporting from implementing partners or subrecipients. Key performance metrics will include the number of housing units completed, funds disbursed, households assisted, and percentage of assistance benefiting low- and moderate-income (LMI) households.

HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including, but not limited to eligibility verification, affordability standards, duplication of benefits (DOB) compliance, and timely expenditure of funds. Projects that fail to meet performance benchmarks or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.

	<p>Performance and Monitoring</p> <p>The County will monitor housing program performance through quarterly reporting from implementing partners or subrecipients. Key performance metrics will include the number of housing units completed, funds disbursed, households assisted, and percentage of assistance benefiting low- and moderate-income (LMI) households.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including, but not limited to eligibility verification, affordability standards, duplication of benefits (DOB) compliance, and timely expenditure of funds. Projects that fail to meet performance benchmarks or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.</p>
National Objective	LMI, LMH, and UN
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID.
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.
Maximum Assistance	The maximum assistance per project is \$92,500,000.00 with a maximum cost per unit, including acquisition and program delivery costs will be up to \$800,000.00.

Process Exceptions	<ol style="list-style-type: none"> 1. Applicants for homes should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>														
Selection Criteria	<p>The County will conduct targeted outreach to qualified developers, including those with experience delivering affordable housing using tax credits or federal funds</p> <p>Projects will be selected using the following criteria:</p> <table border="1" data-bbox="470 825 1437 1332"> <thead> <tr> <th data-bbox="470 825 1224 889">Criteria</th><th data-bbox="1224 825 1437 889">Weight</th></tr> </thead> <tbody> <tr> <td data-bbox="470 889 1224 952">Alignment with Identified Recovery Needs</td><td data-bbox="1224 889 1437 952">25%</td></tr> <tr> <td data-bbox="470 952 1224 1015">Population Served</td><td data-bbox="1224 952 1437 1015">25%</td></tr> <tr> <td data-bbox="470 1015 1224 1079">Project Impact</td><td data-bbox="1224 1015 1437 1079">20%</td></tr> <tr> <td data-bbox="470 1079 1224 1142">Financial Considerations</td><td data-bbox="1224 1079 1437 1142">15%</td></tr> <tr> <td data-bbox="470 1142 1224 1205">Applicant Attributes and Readiness to Launch</td><td data-bbox="1224 1142 1437 1205">15%</td></tr> <tr> <td data-bbox="470 1205 1224 1332" style="text-align: center;">TOTAL</td><td data-bbox="1224 1205 1437 1332" style="text-align: center;">100%</td></tr> </tbody> </table>	Criteria	Weight	Alignment with Identified Recovery Needs	25%	Population Served	25%	Project Impact	20%	Financial Considerations	15%	Applicant Attributes and Readiness to Launch	15%	TOTAL	100%
Criteria	Weight														
Alignment with Identified Recovery Needs	25%														
Population Served	25%														
Project Impact	20%														
Financial Considerations	15%														
Applicant Attributes and Readiness to Launch	15%														
TOTAL	100%														
Max Grant Size	The county does not intend to subgrant funds under this program.														
Unmet need tie back or mitigation needs	Provides permanent housing solutions for households experiencing displacement and housing instability as a direct result of the Maui Wildfires, addressing critical unmet housing needs.														
Citizen Participation	Outreach will include media campaigns and targeted strategies to ensure that displaced households receive timely and accurate program information. The County will coordinate with other disaster-related case management entities to facilitate program participation for displaced individuals and households.														
Other Program	<ul style="list-style-type: none"> • Maintain a minimum 20-year affordability period 														

Considerations

- Solar and energy-efficiency features are strongly encouraged

4b. First-Time Homebuyer Opportunity

The First-Time Homebuyer Program provides an opportunity to become a homeowner to eligible households in need of permanent housing. This program will prioritize renters displaced by the Maui wildfires, while remaining open to all first-time homebuyers up to 120% AMI with priority given to households with incomes at or below 80% AMI.

Homebuyers must be able to secure a fixed-rate mortgage. As a general guideline, housing costs should not exceed 30% of gross monthly income. The County will work with lenders and housing counselors to assess mortgage readiness.

The County will ensure that it recoups all or a portion of the CDBG-DR assistance provided to the homebuyer(s) if the housing unit ceases to be the principal residence of the homebuyer(s) for the duration of the period of affordability. All subsidy amounts that directly benefit the homebuyer(s) are subject to recapture, including development subsidies used to reduce the sales price below market. The affordability period and recapture terms will be defined in a written agreement and recorded in the property title.

Allocation Amount	\$92,500,000.00
Eligible Activities	<p>24 CFR 570.201(n)</p> <ul style="list-style-type: none">• Section 105(a)(20) – Housing Counseling Services• Section 105(a)(24) – Provision of direct assistance to facilitate and expand homeownership
Eligible Applicants	<ul style="list-style-type: none">• Be first-time homebuyers <i>(Defined as an individual or household who has not owned a home during the three years prior to the purchase of a home with HUD assistance)</i>• Occupy the home as their primary residence• Be able to secure a mortgage• Complete HUD-certified housing counseling
Intended Beneficiaries, Requirements, and Prioritization	<p>The intended beneficiary is the same as the applicant for this program. Priority will be given to:</p> <ul style="list-style-type: none">• Disaster impacted renters• Households that meet LMI criteria

	The program prioritizes first-time homebuyers with incomes up to 80% AMI to meet LMI national objectives but may allow participation by households up to 120% AMI using the urgent need or unmet need eligibility criteria where applicable.
Lead Agency and Delivery Model	<ul style="list-style-type: none"> The County of Maui will oversee the program, ensuring compliance with HUD regulations and federal procurement standards. An implementation vendor will manage daily operations, intake and eligibility, and HUD compliance.
National Objective	LMI, LMH, and UN
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID.
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.
Maximum Assistance	The value of assistance provided to eligible homebuyers through this program shall not exceed \$600,000 per household.
Process Exceptions for	<ol style="list-style-type: none"> Applicants for homes should submit a written request that includes documentation of need. Program staff will review request with the Special Considerations Panel. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>
Selection Criteria	See the Intended Beneficiaries, Requirements, and Prioritization section above.
Max Grant Size	The county does not intend to subgrant funds under this program.

Unmet need tie back or mitigation needs	Provides permanent housing solutions for households experiencing displacement and housing instability as a direct result of the Maui Wildfires, addressing critical unmet housing needs.
Citizen Participation	Outreach will include media campaigns and targeted strategies to ensure that displaced households receive timely and accurate program information. The County will coordinate with other disaster-related case management entities to facilitate program participation for displaced individuals and households.
Other Program Considerations	<ul style="list-style-type: none"> • Maintain a minimum 20-year affordability period • Solar and energy-efficiency features are strongly encouraged

E. Infrastructure and Public Facilities

1. Program: Infrastructure and Public Facilities

The Infrastructure and Public Facilities Program provides CDBG-DR gap funding in the form of a subsidy or a loan to repair, upgrade, and construct essential infrastructure and public facilities damaged or affected by the 2023 Maui Wildfires. The program addresses long-term recovery and resilience needs across transportation, water, sewer, and public service facilities. Funds will be prioritized for projects that serve Low- and Moderate-Income (LMI) populations or demonstrate urgent need.

The County will evaluate and prioritize infrastructure investments based on wildfire-related impacts, mitigation potential, cost-effectiveness, and community benefit. Projects must comply with all HUD CDBG-DR eligibility and environmental requirements. Projects may include, but are not limited to:

- Repair, upgrade, or reconstruct disaster-damaged infrastructure and public facilities.
- Improve drainage and stormwater systems to reduce future flood risk.
- Support road, water, and sewer improvements that aid in housing and economic recovery.
- Construct or reconstruct public facilities, including health and wellness facilities, fire stations, and emergency shelters.
- Restore eligible historic public properties in compliance with applicable preservation requirements.
- Develop public transit, parking, and traffic infrastructure that supports recovery and accessibility.

Allocation Amount	\$400,000,000.00
Eligible Activities	<p>24 CFR 570.201, 24 CFR 570.202</p> <ul style="list-style-type: none">• Section 105 (a) (1) – Acquisition of Real Property• Section 105 (a) (2) – Public Facilities and Improvements (except for buildings for the general conduct of government) CDBG-DR Action Plan 188• Section 105 (a) (3) – Code Enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area• Section 105 (a) (4) – Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements• Section 105 (a) (5) – Architectural Barrier Removal• Section 105 (a) (7) – Disposition of Real Property

	<ul style="list-style-type: none"> • Section 105 (a) (9) – Payment of Non-Federal Share (FEMA Public Assistance 10% Non-Federal Cost Share) • Section 105 (a) (12) – Planning Activities • Section 105 (a) (16) – Energy Use Strategies Related to Development Goals <p>Other Intended Uses of Funds:</p> <p>Permitting support</p> <p>To support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays.</p> <p>Reimbursement of Pre-Award Costs</p> <p>Per the Universal Notice, Grantees may reimburse themselves or their subrecipients for otherwise allowable costs incurred on or after the incident date of the qualifying disaster, if the environmental review and all other cross-cutting requirements are met before the underlying activity.</p> <p>The County may acquire property to construct or improve critical ingress and egress routes for emergency vehicles in disaster-impacted areas. The County intends to seek reimbursement for properties acquired pre-award with CDBG-DR funds, provided all HUD requirements for acquisition and mitigation are met, including compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).</p>
Eligible Applicants	<ul style="list-style-type: none"> • Must be an eligible entity under CDBG-DR regulations, for example: <ul style="list-style-type: none"> ○ Public agencies, utilities or housing authorities ○ Nonprofit organizations • For Public Assistance (PA) match projects: must provide documentation of FEMA approval and demonstrate that CDBG-DR funds are only being used for the required non-federal match
Intended Beneficiaries, Requirements, and	The intended beneficiaries of the infrastructure projects are individuals and households in disaster-impacted areas, with a focus on those residing in low- and moderate-income communities.

Prioritization	
Lead Agency and Delivery Model	<p>The County of Maui will oversee the infrastructure program and maintain responsibility for overall compliance and performance. A contracted implementation partner may be engaged to manage day-to-day operations, including procurement of contractors, construction management, and coordination of project timelines and reporting.</p> <p>Performance and Monitoring</p> <p>The County will monitor infrastructure program performance through quarterly reporting from implementing partners, contractors, or subrecipients. Performance metrics will include project milestones achieved, funds disbursed, percent completion by phase, and number of beneficiaries served, particularly within HUD-identified Most Impacted and Distressed (MID) areas.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. The County will also conduct compliance reviews to ensure adherence to HUD requirements, including, but not limited to, environmental review clearance, Davis-Bacon Act compliance (if applicable), procurement standards, and duplication of benefits (DOB) policies. Projects that do not meet required timelines, scope, or compliance standards may be subject to corrective actions, including recapture or reallocation of funds.</p>
National Objective	<p>LMA, LMC, UN, SBS</p> <p><i>Urgent Need (UN) National Objective – Assistance for households above 80% AMI when addressing serious and immediate threats to health, safety, and community stability.</i></p> <ul style="list-style-type: none"> • Use of the urgent need national objective is based on HUD's waiver and alternative criteria under Section III.B.2 of the Universal Notice. This program directly addresses urgent conditions identified in the County's unmet needs assessment, including prolonged displacement, lack of accessible housing for kupuna and caregivers, and increased risk of homelessness, substance use, and domestic violence. • Funding under the urgent need objective will only be used after the County has allocated at least 70% of its total CDBG-DR funds

	to benefit LMI households or if a waiver is granted by HUD.
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.
Maximum Assistance	The maximum assistance for eligible infrastructure projects will be \$100,000,000.00.
Process for Exceptions	<ol style="list-style-type: none"> 1. Project applicants should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>
Selection Criteria	<p>Projects will be evaluated on, but not limited to, the following factors:</p> <ul style="list-style-type: none"> • HUD CDBG-DR criteria • Cost-Effectiveness & Feasibility – Projects with strong cost-benefit and leveraged funding (FEMA, state grants, private investment). • Community Benefit – Investments in water resources, transportation, parking, and economic/housing recovery. • Blight Elimination & Historic Preservation – Activities that address physical deterioration contributing to slum and blight, particularly through the restoration of historic structures with public use or community significance.
Max Grant Size	The County does not intend to subgrant funds under this program.
Unmet need tie	Supports infrastructure and public facilities damaged or impacted by the

back or mitigation needs	2023 Maui Wildfires, enhancing community resilience and safety
Citizen Participation	The program will ensure meaningful citizen participation in infrastructure project planning through public meetings, comment opportunities, and transparent communication.
Other Program Considerations	<ul style="list-style-type: none"> • The County may coordinate with FEMA to leverage Public Assistance (PA) funding for the repair or restoration of eligible publicly owned or operated facilities or infrastructure damaged by the 2023 Maui Wildfires. Where allowable, CDBG-DR funds may be used to provide the required non-federal match for PA-eligible activities. All coordination will comply with FEMA and HUD regulations, including duplication of benefits and cost reasonableness requirements. • Where utility-related work is proposed, particularly where privately owned utility providers are involved, additional documentation will be required to demonstrate public need, cost reasonableness, and alignment with eligible CDBG-DR activities, in accordance with HUD's CDBG-DR Universal Notice (FR-6489-N-01). <ul style="list-style-type: none"> ○ Where applicable, such projects may alternatively be considered under the CDBG-DR mitigation set-aside if they address risks identified in the County's Hazard Mitigation Plan. ○ Proportional use of CDBG-DR funds will be documented in accordance with III.D.6.e of the Universal Notice for infrastructure activities serving broader or mixed service areas.

F. Economic Revitalization Programs

The Economic Revitalization Program provides CDBG-DR funding to expand economic opportunities for individuals and businesses impacted by the 2023 Maui Wildfires. The program focuses on job training and placement, job retention, and business recovery.

The County is specifically exploring program models that support workforce development in skilled trades, construction, and hazard mitigation, as well as the expansion of essential disaster-related services such as healthcare, emergency response, and community support functions critical to long-term recovery.

Allocation Amount	\$15,000,000.00
Eligible Activities	<p>24 CFR 570.203, 24 CFR 570.204</p> <ul style="list-style-type: none">• Sections 105 (a) (8) - Provision of public services• Section 105 (a) (14) - Assistance to public or private (including loans)• Section 105 (a) (15) – Assistance to Eligible Entities for Neighborhood Revitalization, Community Economic Development, and Energy Conservation• Section 105 (a) (17) – Economic Development Assistance to For-Profit Business• Section 105 (a) (21) - Assistance to institutions of higher education• Section 105 (a) (22) – Microenterprise Assistance
Eligible Applicants	<p>Applicants may include, but not be limited to:</p> <ul style="list-style-type: none">• The County of Maui• Nonprofit organizations• Economic development corporations or other public entities that carry out economic recovery activities <p>Applicants</p> <ul style="list-style-type: none">• Must demonstrate experience in economic development, workforce training, or commercial infrastructure that supports economic recovery• Must show disaster tie-back and benefit LMI or Urgent Need populations• Must comply with HUD standards on procurement, reporting, and

	accessibility
Intended Beneficiaries, Requirements, and Prioritization	<p>The County will prioritize subrecipients and business assistance programs that provide the most benefit for:</p> <ul style="list-style-type: none"> • Households and businesses impacted by the wildfire • LMI households, LMI-owned businesses, and/or small or microbusinesses • Essential businesses operating in LMI areas
Lead Agency and Delivery Model	<p>The County will:</p> <ul style="list-style-type: none"> • Coordinate outreach with nonprofit institutions and business and labor networks • Share program eligibility and performance expectations • Provide technical assistance to qualified providers and applicants <p>Performance and Monitoring: HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements.</p> <p>The County will monitor program performance using quarterly reporting from the implementing partner. Metrics include the number of businesses assisted, total funds disbursed, and jobs created or retained. The County will also conduct compliance reviews to ensure adherence to HUD's duplication of benefits requirements and program eligibility. Underperforming awards may be subject to recapture or reallocation.</p>
National Objective	LMI, LMJ, LMA, and UN
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.
Reducing	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who

Impediments	need assistance accessing the program.														
Maximum Assistance	The maximum assistance for eligible activities under this program is \$7,500,000.00.														
Process for Exceptions	<ol style="list-style-type: none"> 1. Applicants should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>														
Selection Criteria	<p>Contractors will be selected and scored using the following criteria:</p> <table border="1"> <thead> <tr> <th>Criteria</th><th>Weight</th></tr> </thead> <tbody> <tr> <td>Alignment with Identified Recovery Needs</td><td>25%</td></tr> <tr> <td>Population Served</td><td>25%</td></tr> <tr> <td>Impact on Economic Revitalization</td><td>20%</td></tr> <tr> <td>Financial Considerations</td><td>15%</td></tr> <tr> <td>Applicant Attributes and Readiness to Launch</td><td>15%</td></tr> <tr> <td>TOTAL</td><td>100%</td></tr> </tbody> </table>	Criteria	Weight	Alignment with Identified Recovery Needs	25%	Population Served	25%	Impact on Economic Revitalization	20%	Financial Considerations	15%	Applicant Attributes and Readiness to Launch	15%	TOTAL	100%
Criteria	Weight														
Alignment with Identified Recovery Needs	25%														
Population Served	25%														
Impact on Economic Revitalization	20%														
Financial Considerations	15%														
Applicant Attributes and Readiness to Launch	15%														
TOTAL	100%														
Max Grant Size	The County does not intend to subgrant funds under this program.														
Unmet need tie back or mitigation needs	Supports business recovery and workforce realignment for individuals and sectors impacted by the 2023 Maui Wildfires														
Citizen Participation	The County will continue engaging business and community leaders as the program is implemented. The CDBG-DR website will publish clear program policies and eligibility criteria.														
Other Program Considerations	<ul style="list-style-type: none"> • Funds may not duplicate other sources • Any university driven education programs will ensure CDBG-DR funds only supplement and do not supplant other available funds such as FAFSA. 														

G. Public Services

1. Program: Public Services

The Public Services Program provides funding to support services that improve recovery outcomes and reduce impediments for disaster-impacted and LMI communities in Maui County. This program will fund new or expanded services, including, but not limited to:

- Health and wellness services
- Public transportation access
- Support for individuals experiencing homelessness
- Childcare

While capital improvements like buses and shelters can be addressed through Infrastructure Programs, this program supports the operation of expanded bus routes, outreach services, and staffing necessary to restore and improve access to critical services.

Allocation Amount	\$25,000,000.00
Eligible Activities	<p>24 CFR 570.201(e)</p> <ul style="list-style-type: none">• Section 105 (a) (8) – Public Service <p>Other Intended Use of Funds:</p> <ul style="list-style-type: none">• Permitting support – to support timely implementation of disaster recovery activities, a portion of program delivery funds may be used to increase capacity within the County's permitting office, helping to expedite recovery timelines and reduce administrative delays. <p>Ineligible services include:</p> <ul style="list-style-type: none">• Pre-existing services that will operate at the same capacity before the disaster• Services that do not demonstrate a disaster-related tie-back
Eligible Applicants	<ul style="list-style-type: none">• The County of Maui• Nonprofit organizations (e.g., health organizations)• Public agencies or authorities
Intended Beneficiaries, Requirements, and Prioritization	<ul style="list-style-type: none">• LMI individuals• Individuals or households with disaster-related unmet needs

<p>Lead Agency and Delivery Model</p>	<p>The County of Maui will administer the program with support from the implementation vendor. Funds will be delivered through grants to nonprofit and public service organizations and internal County departments with capacity to implement CDBG-DR-eligible services.</p> <p>The County will:</p> <ul style="list-style-type: none"> • Conduct outreach to nonprofit, public agencies, and County departments • Share program criteria and technical assistance guidance <p>The County, in coordination with the implementation vendor, will:</p> <ul style="list-style-type: none"> • Screen and evaluate provider proposals for eligibility, tieback, and capacity • Monitor financial compliance, beneficiary documentation, and performance benchmarks • Report program outcomes to HUD under CDBG-DR rules <p>Performance and Monitoring</p> <p>Public service programs will be monitored throughout implementation to ensure they deliver measurable community benefits and meet HUD requirements. The County will establish performance benchmarks such as number of individuals served, service utilization rates, and improvements in access to essential services.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. Programs will be tracked for both short-term impact and long-term sustainability, with a focus on benefiting LMI households. The County will conduct periodic compliance reviews to ensure adherence to eligibility, duplication of benefits (DOB) policies, and program-specific goals. Programs failing to meet minimum performance or compliance standards may be subject to corrective action or reallocation of funds.</p>
<p>National Objective</p>	<p>LMI, LMC, and UN</p>
<p>Responsible Entity for Environmental Review</p>	<p>Maui County</p>

Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.										
Reducing Impediments	The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program.										
Maximum Assistance	The maximum assistance amount awarded under this program will be \$2,000,000.00.										
Process for Exceptions	<ol style="list-style-type: none"> 1. Applicants should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>										
Selection Criteria	<p>Services must:</p> <ul style="list-style-type: none"> • Address a disaster related unmet need • Primarily benefit LMI households • Be distinct from general government functions or existing public services (unless it's an expansion of services due to disaster demand) • Not create a duplication of benefits <p>Applications will be ranked based on the following criteria:</p> <table border="1"> <thead> <tr> <th>Criteria</th> <th>Weight</th> </tr> </thead> <tbody> <tr> <td>Alignment with Identified Recovery Needs</td> <td>25%</td> </tr> <tr> <td>Population Served</td> <td>25%</td> </tr> <tr> <td>Services Targeting Medical or Mental Health Support</td> <td>20%</td> </tr> <tr> <td>Financial Considerations</td> <td>15%</td> </tr> </tbody> </table>	Criteria	Weight	Alignment with Identified Recovery Needs	25%	Population Served	25%	Services Targeting Medical or Mental Health Support	20%	Financial Considerations	15%
Criteria	Weight										
Alignment with Identified Recovery Needs	25%										
Population Served	25%										
Services Targeting Medical or Mental Health Support	20%										
Financial Considerations	15%										

<p style="text-align: center;">Applicant Attributes and Readiness to Launch</p>	
<p style="text-align: center;">TOTAL 100%</p>	
Max Grant Size	The County does not intend to subgrant funds under this program.
Unmet need tie back or mitigation needs	Supports service access, health, housing stability, and permitting capacity for disaster-impacted households and communities
Citizen Participation	<p>The County will conduct stakeholder engagement, data analysis, and public meetings to identify priority service needs.</p> <p>The County will encourage subrecipients to include media campaigns and targeted strategies to ensure that intended beneficiaries of services receive timely and accurate program information.</p>
Other Program Considerations	None

H. CDBG-DR Mitigation Set-Aside

1. Program: Mitigation Programs

The CDBG-DR mitigation set-aside is a required allocation equal to 15% of the total grant and cannot be reduced or reprogrammed for other recovery uses. This dedicated portion must be used for activities that reduce future disaster risk and increase community resilience, as defined by HUD and informed by Maui County's FEMA-approved Hazard Mitigation Plan.

This program is designed to serve two distinct purposes:

1. **FEMA Hazard Mitigation Grant Program (HMGP) Match** – Mitigation funds will provide the required non-federal match (typically 25%) for FEMA-approved mitigation projects. These projects are generally capital improvements aimed at reducing risk from wildfires, floods, wind, and seismic activity.
2. **Community Resilience Set-Aside** – The remaining portion of mitigation funds broader, forward-looking projects that enhance the County's long-term resilience. These investments may not qualify under FEMA's hazard-specific definitions but play a critical role in stabilizing housing, infrastructure, and local economies in the face of future threats.

Together, these initiatives enable Maui County to strengthen its built environment, safeguard public health and safety, and promote sustainable recovery practices. Projects may address:

- Flood control, wildfire mitigation, fire-resistant infrastructure
- Wind and seismic retrofits for public facilities
- Energy resilience: microgrids, backup power, solar + battery storage
- Water systems: access, distribution, and storage upgrades
- Transportation: mobility, emergency access, transit enhancements
- Housing resilience and affordability
- Parking and access improvements
 - Development of designated parking areas and related access infrastructure that directly support eligible CDBG-DR projects or facilities (e.g., housing for LMI households, public services, or critical community facilities).
 - Improvements must be necessary to ensure operational functionality, accessibility, or life-safety access, and may include traffic flow enhancements to reduce congestion and improve emergency response access
- Strategic business relocation and hazard-resilient economic redevelopment:
 - Assistance to eligible businesses in high-risk areas to support voluntary relocation, continuity of operations, and hazard risk reduction through strategic buyouts or site transitions
 - The creation or retention of permanent jobs for LMI individuals

The County may also offer voluntary buyouts for properties located in high-risk areas, as part of its long-term strategy to reduce future hazard exposure and promote safer, more resilient land use.

Allocation Amount	\$213,832,000.00 <ul style="list-style-type: none">• HMGP Match \$15,000,000.00• Mitigation Set-Aside \$198,832,000.00
Eligible Activities	<p>24 CFR 570.201, 24 CFR 570.202</p> <ul style="list-style-type: none">• Section 105 (a) (1) – Acquisition of Real Property• Section 105 (a) (2) – Public Facilities and Improvements• Section 105 (a) (3) – Code Enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area• Section 105 (a) (4) – Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements• Section 105 (a) (5) – Architectural Barrier Removal• Section 102 (a) (7) – Disposition of Real Property• Section 105 (a) (9) – Payment of Non-Federal Share• Section 105 (a) (11) – Relocation• Section 105 (a) (12) – Planning Activities• Section 105 (a) (13) – Payment of reasonable administrative costs• Section 105 (a) (16) – Energy Use Strategies Related to Development Goals (resiliency)• Section 105 (a) (17) – Economic Development Assistance to Eligible Businesses <p>The County's mitigation priorities are informed by the risks identified in the FEMA-approved <i>County of Maui Hazard Mitigation Plan</i>.</p> <p>Other Intended Uses of Funds:</p> <p>Reimbursement of Pre-Award Costs</p> <p>Per the Universal Notice, Grantees may reimburse themselves or their subrecipients for otherwise allowable costs incurred on or after the incident date of the qualifying disaster, if the environmental review and all other cross-cutting requirements are met before the underlying</p>

	<p>activity.</p> <p>The County intends to seek reimbursement for properties acquired pre-award with CDBG-DR funds, provided all HUD requirements for acquisition and mitigation are met, including compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).</p>
<p>Eligible Applicants</p>	<p>Under the CDBG-DR Mitigation Set-Aside, eligible applicants must be entities that can carry out eligible mitigation activities and meet the program's statutory and regulatory requirements. Applicants may include, but are not limited to:</p> <ul style="list-style-type: none"> • The County of Maui • The State of Hawai'i • Nonprofit Organizations • Public agencies <p>Project recipients must commit to long-term maintenance and sustainability of funded infrastructure improvements</p>
<p>Intended Beneficiaries, Requirements, and Prioritization</p>	<ul style="list-style-type: none"> • LMI individuals or LMA • Areas or populations that suffered disaster damage and continue to face risk • Critical community systems (e.g., water) that serve HUD-designated MID areas
<p>Lead Agency and Delivery Model</p>	<p>The County of Maui will oversee the program, ensuring compliance with HUD CDBG-DR regulations, FEMA's HMGP guidelines, and alignment with community mitigation priorities.</p> <p>The County will:</p> <ul style="list-style-type: none"> • Identify and prioritize projects that promote long-term resilience • Allocate funds to municipalities, housing developers, and public service providers • Coordinate with local agencies, non-profits, and private entities to maximize project impact • Coordinate with FEMA and the State of Hawai'i to identify eligible HMGP projects. • Provide CDBG-DR funds to cover the non-federal match, ensuring projects move forward without financial impediments. • Monitor project implementation to ensure compliance with HUD

	<p>and FEMA regulations.</p> <h3>Performance and Monitoring</h3> <p>Mitigation programs will be monitored throughout implementation to ensure they achieve measurable risk reduction and resilience outcomes aligned with HUD and FEMA-defined hazard mitigation standards. The County will establish performance benchmarks such as project completion milestones, hazard risk reduction metrics, and improved resilience for infrastructure, housing, or critical facilities.</p> <p>HUD requires that all CDBG-DR activities, whether funded in whole or in part, must be continuously monitored to ensure compliance with federal laws, regulations, and program requirements. Monitoring will include, but not be limited to, evaluation of compliance with mitigation eligibility criteria, environmental review requirements, and integration with the County's Hazard Mitigation Plan or other resilience frameworks. Projects that fail to meet performance targets or compliance standards may be subject to corrective actions, including reallocation or recapture of funds.</p>
National Objective	<p>LMA, LMJ, and Urgent Need</p> <ul style="list-style-type: none"> Activities included in this Action Plan may qualify under the Urgent Need national objective, consistent with 24 CFR 570.208(c), as they address conditions that pose a serious and immediate threat to the health and safety of residents in areas impacted by the wildfires. These activities such as property acquisition, defensible space creation, and flood or wildfire risk reduction are designed to lessen the long-term impact of future disasters where no other financial resources are available to address the need.
Responsible Entity for Environmental Review	Maui County
Geographic Areas	According to the Universal Notice, the entirety of Maui County is identified as the MID with priority given to those properties in, or closest to, the burn scar.
Reducing Impediments	Projects were generally identified in coordination with FEMA to support mitigation infrastructure improvements in Maui. These projects are

	intended to benefit the general public and comply with all applicable federal laws, including nondiscrimination requirements in project selection and implementation.
Maximum Assistance	<p>The County will provide the required 25% non-federal cost share for eligible HMGP projects.</p> <p>For eligible mitigation projects, the County will impose a maximum assistance amount of \$50,000,000.00.</p>
Process for Exceptions	<ol style="list-style-type: none"> 1. Applicants should submit a written request that includes documentation of need. 2. Program staff will review request with the Special Considerations Panel. 3. Program staff will provide applicant with written decision within timeframe specified in policies and procedures. <p>All approved exceptions will be tracked for compliance purposes.</p>
Selection Criteria	<p>To qualify, projects must:</p> <ul style="list-style-type: none"> • Support long-term recovery from the 2023 Maui Wildfires. • Meet CDBG-DR National Objectives, benefiting LMI residents or addressing Urgent Need. • Enhance infrastructure, housing, transportation, water access, or economic sustainability. • Show financial feasibility, cost-effectiveness, and long-term sustainability. • Be approved for FEMA HMGP funding (HMGP match only). • Comply with CDBG-DR National Objectives, including LMI Benefit or Urgent Need. • Be implemented by public agencies, utilities, or eligible nonprofit organizations. <p>Priority will be given to:</p> <ul style="list-style-type: none"> • Projects that mitigate wildfire, flood, or storm risks. • Critical infrastructure upgrades that enhance community resilience. • Mitigation measures that protect LMI communities or essential public services.

	<p>The County will allocate funds based on a structured selection process, ensuring that match funding is efficiently and equitably distributed. For Project Identification & Coordination the County will work with FEMA, the State of Hawai'i, and local agencies to identify HMGP-approved projects.</p> <p>Projects may be ranked utilizing the following criteria:</p> <table border="1"> <thead> <tr> <th>Criteria</th><th>Weight</th></tr> </thead> <tbody> <tr> <td>Alignment with Identified Recovery Needs and Community Resilience Goals</td><td>25%</td></tr> <tr> <td>Population Served</td><td>25%</td></tr> <tr> <td>Project Impact</td><td>20%</td></tr> <tr> <td>Financial Considerations</td><td>15%</td></tr> <tr> <td>Applicant Attributes and Readiness to Launch</td><td>15%</td></tr> <tr> <td>TOTAL</td><td>100%</td></tr> </tbody> </table>	Criteria	Weight	Alignment with Identified Recovery Needs and Community Resilience Goals	25%	Population Served	25%	Project Impact	20%	Financial Considerations	15%	Applicant Attributes and Readiness to Launch	15%	TOTAL	100%
Criteria	Weight														
Alignment with Identified Recovery Needs and Community Resilience Goals	25%														
Population Served	25%														
Project Impact	20%														
Financial Considerations	15%														
Applicant Attributes and Readiness to Launch	15%														
TOTAL	100%														
Max Grant Size	The County does not intend to subgrant funds under this program.														
Unmet need tie back or mitigation needs	<p>HMGP Match: All projects will be designed to align with FEMA's hazard mitigation priorities and HUD's CDBG-DR resilience goals. This program exclusively funds hazard mitigation projects, ensuring:</p> <ul style="list-style-type: none"> • Stronger infrastructure to withstand future disasters. • Reduced wildfire, flood, and storm risks for vulnerable communities. • Resilient energy solutions to maintain essential services during disasters. <p>Mitigation Set-Aside: All projects funded under this program must enhance long-term community resilience ensuring:</p> <ul style="list-style-type: none"> • Expanded water infrastructure and reliability. • Stronger transportation networks to improve mobility and emergency access. 														

	<ul style="list-style-type: none"> • Affordable and resilient housing solutions to support population retention. • Economic initiatives that reduce long-term financial vulnerability. • Energy resilience investments to maintain essential services in future disruptions. <p>Unlike hazard mitigation, these projects focus on social and economic stability as a key component of Maui's recovery.</p>
Citizen Participation	<p>The County will coordinate directly with the State of Hawai'i and relevant County departments to identify and evaluate eligible mitigation and resilience projects. While primary outreach will target governmental partners, the County may also engage with nonprofit organizations, public agencies, housing entities, and infrastructure providers to ensure that eligible projects—particularly those related to housing and long-term community resilience—are not overlooked. Program guidelines and technical assistance will be made available as appropriate to support project development and compliance.</p> <p>The County of Maui is committed to maintaining meaningful public engagement throughout the implementation of mitigation programs funded under the CDBG-DR mitigation set-aside. In alignment with HUD's Universal Notice requirements, the County will continue to inform and involve residents and stakeholders through public meetings, updates to the disaster recovery website, and ongoing opportunities for comment and feedback. All mitigation activities will be developed and administered with transparency and in accordance with the County's citizen participation plan, including timely notice, accessible information, and appropriate opportunities for public input.</p>
Other Program Considerations	

VI. GENERAL INFORMATION

Throughout the disaster recovery process, the County has consulted with disaster-affected citizens, stakeholders, local governments, state and federal partners, nonprofit and private sectors, public housing authorities, and other community members, including the Mayor's advisory group, in the surrounding geographic area, to ensure a comprehensive and inclusive approach to gather data and information of disaster impacts.

The County recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through ongoing public meetings provided in person, as well as live-streamed for fire-displaced Maui residents currently residing outside of the County. This included holding five neighborhood workshops, the distribution of three different community surveys, and conducting 190 interviews. The neighborhood workshops have involved approximately 900 participants, and the survey resulted in over 2,500 respondents.

Figure VI-1. Community Outreach



Additionally, the County Office of Recovery has launched Ola Lahaina, an online recovery portal, found at: <https://www.mauirecovers.org/lahaina>. This platform has and will continue to serve as the central hub for community engagement. “Ola” in Hawaiian represents life, health, and well-being which embodies the commitment of the County to the resilience of the impacted community.

A. Citizen Participation

1. Consultation of Developing the Action Plan

To engage with residents and stakeholders, the County has utilized and coordinated with the substantial network of community and social groups in Maui to support and encourage participation from disaster-impacted individuals. The County's communication and outreach strategy was successfully implemented in the development of the Action Plan and will be

replicated and expanded as necessary to provide the whole community with information about the programs and how to participate. The County's strategy includes:

- Engaging in community meetings open to the public.
- Consulting with disaster-impacted individuals, stakeholders, local governments, public housing authorities, and other parties in the community to ensure comprehensive and inclusive communication about CDBG-DR program participation.
- Coordinating with community groups including the Mayor's advisory group.
- Providing information to the community in accessible formats through various local groups.
- Advancing community engagement and input through program surveys, website portals, email, and mailings, social media engagements, and creating vital program materials in accessible formats, including languages most commonly spoken for communities most likely to be impacted by services of programs.
- Engaging in ongoing coordination with public service providers that work with disaster-impacted populations to ensure that any remaining or ongoing disaster-related impacts are brought to the County's attention to enable a coordinated approach to recovery.

The County established a communication team and developed a recognizable brand for the CDBG-DR program: Maui Recovers. The County established a program name and logo, webpage: www.mauirecovers.org, email address support@mauirecovers.com; published quick response (QR) codes; developed digital and printed media; and circulated social media content to inform community members and leaders about the CDBG-DR allocation and eligible uses of funding.

The County coordinated with local partners to provide hard copies of program documents at County facilities, public libraries and recovery resource centers with information available in accessible formats. The County provided flyers for the public meetings and placed paper copies of the survey in local facilities and County buildings.

Figure VI-2. Community Meetings



Outreach to Stakeholders

In anticipation of notification from HUD of the County's CDBG-DR award, the County met with key community partners to encourage participation from key stakeholders and community groups in the development of the Action Plan. The County met with many local organizations providing information and asking for Action Plan input. Outreach to and coordination with these groups included:

Table VI-1. Outreach – Coordination Meetings and Presentations

Community Partner Organization	Sector	Service Focus
Mayor's Advisory Council	Local Government	Whole Community
Maui Homeless Alliance Continuum of Care (MHACOC)	Social Services	Homeless prevention
Maui Community Associations	Community Organization	Local Communities
Council for Native Hawaiian Advancement	Social Services	Native Hawaiians
Maui Chapter of the American Institute of Architects (AIA)	Professional Services	Housing, Infrastructure Design
Maui County Council	Local Government	Whole Community
Office of Hawaiian Affairs (OHA)	State Government	Whole Community
Hawai'i Public Housing Authority (HPHA)	State Government	Housing Low to Mod Income; Workforce
Volunteer Organizations Active in Disasters (VOAD)	Community Organization	Whole Community
Front Street Recovery Group	Community Organization	Local Neighborhood
Maui Chamber of Commerce	Local Government	Businesses
Maui County Recovery Support Function Groups	Mixed	Mixed

Nā Keiki O Emalia Adult Support Groups	Social Services	Adult Care
Mana Mental Health	Health Services	Mental Health Services and Supports
County of Maui Department of Fire and Public Safety	Local Government	Fire Prevention/Safety
Maui Health System	Health Services	Whole Community
County of Maui Office of Economic Development	Local Government	Businesses and the Whole Community They Serve
County of Maui Office of Recovery	Local Government	Whole Community
Nā Hoaloha (assists kupuna and persons with disabilities as an Interfaith service group)	Health Services	Kupuna and Disabled Persons
County of Maui Department of Housing	Local Government	Low to Moderate Income Housing; Workforce
Interfaith Alliance of Hawai‘i	Community Organization	Whole Community
U.S. Department of Housing and Urban Development (HUD)	Federal Government	Whole Community, LMI/LMA, Housing Recovery
State of Hawai‘i Department of Commerce and Consumer Affairs (DCCA)	State Government	Businesses and Their Customers
Maui District Health Office, State Department of Health	State Government	Whole Community
County of Maui Emergency Management Agency (MEMA)	County Government	Emergency Management/Safety

Department Hawaiian Home Lands (DHHL)	State Government	Native Hawaiians
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2. Public Hearings

HUD requires grantees receiving CDBG-DR allocations of \$500 million or more to conduct at least three public hearings, with each in-person hearing held in a different HUD-identified MID area to ensure geographic and community access; virtual hearings are permitted. Public hearings were held on March 8, 11, and 14, 2025, within the HUD-identified Most Impacted and Distressed (MID) area in the County to allow for public comments on the Action Plan.

The County conducted three public hearings in to gather community input on this Action Plan. These hearings allowed the public to ask questions and provide comments about how the funding will be used. Updates to the Action Plan were incorporated based on public feedback.

Public hearings provided a short presentation to educate the public on the CDBG-DR grant program and eligible activities, followed by participant comments and questions. Attendees also had the opportunity to complete surveys in hard copy format or electronic.

Table VI-2. Dates, Times, and Locations for Public Hearings

Meeting Date	Time	Location
March 8, 2025	3:00-5:00pm	(In-person) Lahaina, Princess Nahi‘ena‘ena Elementary School
March 11, 2025	3:00-5:00pm	(Virtually) Weblink to posted on Mauirecovers.org
March 14, 2025	5:30-7:30pm	(In-Person) Wailuku, Cameron Center

Access to Public Hearings

The hearings were held at facilities to promote a geographic balance and maximized accessibility for stakeholders to actively participate. County staff selected the public meeting locations based on their capacity to meet the needs of the community, its commonly used space for community

events, and the physical accessibility feature to accommodate individuals with disabilities. The virtual public hearing maximized attendance and encouraged participation by enabling interested residents temporarily living on the mainland to provide input. It also allowed the County to respond directly to all attendees' questions in real time.

3. Public Comments

The County posted this Action Plan on the CDBG-DR webpage for a minimum 30-day public comment period (February 25, 2025 - March 31, 2025) and notified citizens through local media. Comments were collected in the following formats:

- Via email: cdbg-dr@mauicounty.gov
- Using an online form available on the CDBG-DR website: www.mauirecovers.org/cdbgdr
- Collected from public hearing
- Via mail: Office of Recovery, County of Maui, 200 S. High Street, Wailuku, HI 96793

Outreach to inform affected citizens of the comment period through various methods included e-mails, press releases, media announcements, and contacts with neighborhood and community organizations. The County will consider all comments received both orally and in writing on the Action Plan.

4. Consideration of Public Comments

All oral and written comments received during the initial public comment period for the draft Action Plan will be posted with responses on the CDBG-DR website. A summary of key comments and responses was provided in a community meeting on April 16, 2025. A summary of all comments on this Action Plan, along with the County responses, are included in the appendix.

5. Connecting Displaced Residents to Recovery Resources

The County will collaborate with other disaster response and recovery partners to utilize available disaster-related data sources to implement targeted outreach strategies to ensure displaced residents, including those currently off-island, have access to recovery information and services. This includes providing updates through multiple communication channels such as mailers, phone outreach, and digital tools, along with in-person assistance where possible. Maui's strong culture of community networks will be leveraged to help share information and connect residents to available resources. Support will be tailored to individuals with varying levels of technology access or familiarity to ensure broad participation.

6. Citizen Complaints

Any complaints regarding fraud, waste, or abuse of government funds will be handled in accordance with the County's CDBG-DR policies on fraud, waste, or abuse and substantiated complaints will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). The County will make available to HUD detailed Fraud, Waste, and Abuse

Policies and Procedures to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

Citizens may file suggestions or concerns by emailing cdbg-dr@mauicounty.gov. All concerns received shall be reviewed by the County's CDBG-DR program staff for:

- 1) Conducting investigations, as necessary,
- 2) Finding a resolution, or
- 3) Conducting follow-up actions

The County will provide a written response to citizen complaints within 15 business days following the receipt of the complaint. If additional time is needed, the County will document the reason for needing additional time.

B. Modifications to Action Plan

The County will amend its Action Plan to update its needs assessments, modify or create new activities, or reprogram funds, as necessary. Each amendment will be published on the County's CDBG-DR website and describe the changes within the context of the entire Action Plan. Notification of amendments will be advertised through various outreach methods that will include electronic mailings, press releases, statements by public officials, media advertisements, social media, public services announcements, and/or contacts with neighborhood organizations. The County's current version of its entire Action Plan will be accessible for viewing as a single document at any given point in time.

1. Substantial Amendment

A change to this action plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity,
- A proposed reduction in the overall benefit requirement,
- A cumulative budget change that reallocates more than 5% of the total grant allocation; or
- An update to the submitted initial Action Plan if the original submission was incomplete.

When the County pursues the substantial amendment process, the amendment will be posted on its CDBG-DR website and allow a 30-day public comment period. Notification of substantial amendment comment periods will be advertised through various outreach methods that will include electronic mailings, press releases, statements by public officials, media advertisements, social media, public services announcements, and/or contacts with neighborhood organizations. The County will review and respond to all public comments received and submit to HUD for approval.

2. Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. The County will notify HUD five (5) business days before the change is effective.

All amendments (substantial and non-substantial) will be numbered sequentially and posted to the website into one final, combined plan.

C. Performance Reports

The U.S. Department of Housing and Urban Development (HUD) requires all Community Development Block Grant – Disaster Recovery (CDBG-DR) grantees to use the Disaster Recovery Grants Reporting (DRGR) system to manage and report on disaster recovery programs. This system serves as the official database for recording project and program changes, amendments, and accomplishments.

All modifications to projects and programs will be documented in DRGR. Any changes to the Action plan (AP) will be reflected both in the DRGR system and the formal Action Plan. Project adjustments within DRGR will only be implemented after HUD has approved the corresponding changes in the formally submitted AP. Additionally, all programmatic changes, revisions, accomplishment records, and required reporting will be managed within DRGR.

Updates or modifications required in DRGR will be completed within five business days of approval by the County's CDBG-DR Program Manager or, in the case of AP amendments, within five business days of HUD's approval. The CDBG-DR Program Manager, in coordination with the County's CDBG-DR consultant, will oversee all updates, revisions, and reporting to ensure compliance with DRGR program requirements.

To support effective management of the DRGR system, the County will ensure that staff receive adequate training, and the consultants possess the necessary expertise and familiarity with DRGR.

1. Quarterly Performance Reports (QPRs)

The County is required to complete QPRs in the DRGR system. QPRs must be submitted no later than 30 calendar days following the end of each calendar quarter, beginning after the grant award and continuing until all funds have been expended and all expenditures have been fully reported. Once approved by HUD, the County will publish a version of the QPR that omits PII on its CDBG-DR website within three calendar days.

2. Program Income

Some programs funded through CDBG-DR may generate program income. Program income is defined as gross income received by the County that is directly generated from the use of CDBG-

DR funds. This may include, but is not limited to, payments from subsidized home sales, loan repayments, infrastructure loans, or rental revenue from program-supported properties.

The County will ensure that all program income is tracked, reported, and used in accordance with HUD regulations and program requirements. Any program income received will be reinvested into eligible CDBG-DR activities, further supporting disaster recovery and long-term community resilience. The County will comply with all applicable federal guidelines regarding the use and management of program income.

VII. APPENDIX A: SUMMARY COMMENTS AND RESPONSES ON SPECIFIC PROJECTS AND PROGRAMS

Topic	Number of Comments Received	Summary of Comments Received	County Response
Firebreaks and public spaces	14	<p>Comments received encouraged the County of Maui (“the County”) to focus on developing firebreaks and developing public space plans that will protect Lahaina from future fires or similar disasters.</p> <p>Comments outlined the need for various infrastructure projects and indicated public support for addressing certain projects using CDBG-DR funding to help to mitigate the risk of similar wildfires in the future.</p>	<p>The County’s current mitigation set-aside program allows for projects that address enhancements to public spaces and wildfire mitigation projects have been added as an eligible expense.</p> <p>CDBG-DR funds should be used to support mitigation strategies that reduce impacts from future disasters and the County continues to analyze data to make informed decisions on project prioritization. The County has noted the recommendations for public space planning to plan on firebreaks and evacuation routes to be included within the Action Plan and have made edits that reflect this community priority.</p>
Healthcare and/or mental health services	51	Comments received encouraged the County to focus on healthcare and/or mental health services within the CDBG-DR Action Plan.	In response to this community feedback, the County has revised the Public Services program to highlight prioritization for organizations that apply for funds under this program and provide medical or mental health services.

		Commenters claimed this would benefit many community members and would help to address many needs in the community that have been identified following the wildfires. The comments expressed as a result of the wildfire, there remains an acute need for mental health resources.	
Housing	239* <i>*Not including Kupuna (see below)</i>	<p>Comments received voiced support of housing replacement, reconstruction, and new homeowner initiatives. Further, comments asked that the County dedicate funding to assist residents in their efforts to replace their homes so that they can safely return.</p> <p>Additional comments were made articulating a desire for the County to use CDBG-DR funds to provide assistance to homeowners who have already begun activities rebuilding their homes.</p>	<p>Supporting homeowners and renters is the top priority for the County.</p> <p>In response to the comments seeking assistance for homeowners whose rebuild is already underway, the County has revised the Single-Family Homeowner Reconstruction Program to include a provision that may make available funds for a CDBG-DR reimbursement option, pending funding availability.</p> <p>Interested and potentially eligible members of the community are encouraged to follow mauirecovers.org for further updates on the implementation timeline and apply for assistance once these housing programs are launched.</p>
Kupuna housing and services	10	Comments received encouraged the County to address Kupuna housing and services within the CDBG-DR	Kupuna remain an important focus of the County's CDBG-DR funding. The Action Plan lists a prioritization for individuals 62 years of age and older in the Single-

		<p>Action Plan.</p> <p>Commenters claimed this would benefit many in the community and help to restore some of what was lost in Lahaina due to the wildfires.</p>	<p>Family Reconstruction Program.</p> <p>Further, the County has specifically listed Kupuna services as an eligible expense in the Public Services program, allowing eligible entities to apply for funds to materially increase services in this important space.</p>
Lahaina Bypass	7	<p>Comments received encouraged the County to expand or provide additional connections to the Lahaina Bypass in the CDBG-DR Action Plan process.</p> <p>Commenters claimed this would improve public safety and could help to avoid loss of life if a similar disaster were to occur again in the future by providing alternative evacuation routes.</p>	<p>The County's draft Action Plan listed eligible expenses within the mitigation set-aside to include projects that address transportation infrastructure to enhance post-disaster accessibility and projects that invest in transportation solutions to reduce post-disaster bottlenecks are eligible expenses.</p>
Lahaina Harbor	24	<p>Comments received by the public outline the economic impact of the Lahaina Harbor and an overall sentiment for CDBG-DR funding to be used to rebuild the harbor.</p>	<p>The County of Maui understands the deep economic impact that the Lahaina Harbor has in West Maui and the importance of it being rebuilt.</p> <p>The County is exploring the viability of various infrastructure projects and potential complications of those owned and under the responsibility of non-County entities, like the Lahaina Harbor.</p>
Language	33	Comments received	The County understands that many in the

Assistance and Community Support		<p>encouraged the County to develop programs and initiatives to further reach to ensure all impacted disaster survivors can learn about the programs.</p> <p>Commenters encouraged use of case managers and related options to ensure that information is shared appropriately, such that comments and input can be received from all interested parties.</p>	<p>community will need support and instructions to participate in CDBG-DR programs, with continuing outreach and meetings planned to help as many in the community to recover following the wildfires.</p> <p>The County of Maui is committed to working to help the community to be able to benefit from the funding being provided through the CDBG-DR Action Plan and is thankful for the many shared ideas presented during the public comment period.</p>
Parking, permitting, and safety concerns	38	<p>Comments received encouraged the County to develop programs and initiatives to address parking as homes are rebuilt, in order to plan for additional housing density, traffic, and pedestrian safety, while also permitting flow for emergency vehicles and evacuation in time of emergency.</p> <p>Commenters encouraged the County to work on this issue to improve public safety while also using available tools and options to look at this issue in permitting and planning efforts for rebuilding back Lahaina.</p>	<p>The County recognizes the parking challenges that exist in Lahaina. Parking will be addressed within the CDBG-DR projects and programs. Additional steps will be taken to address parking and safety outside the CDBG-DR programs as well.</p>

Traffic, roads, and /or evacuation routes	19	<p>Comments received encouraged the County to use funds for improving roads and related infrastructure, in order to improve options for evacuation routes.</p> <p>Commenters claimed this would improve public safety and might help to avoid loss of life if a similar disaster were to occur again in the future.</p>	<p>The County of Maui has heard those in the community wishing to share input and is considering the comments received from the community during the public comment period, including those focused on looking at future disaster planning by improving traffic flow, roads, and evacuation routes. Similar comments about how parking and roads need to be examined as houses are being rebuilt are also being considered. Traffic flow, well-designed roads and evacuation routes are key infrastructure components for the community and CDBG-DR funding can be used for rebuilding, hardening, improving critical infrastructure.</p> <p>The County remains committed to continuing to look at solutions and funding options to address these concerns, with CDBG-DR funding one potential component that is being carefully considered. The County is thankful for these and other comments that have been shared for consideration in preparing the CDBG-DR Action Plan that is being presented to HUD.</p>
Underground and electric infrastructure	23	<p>Comments received encouraged the County to use funds for undergrounding electrical lines and upgrading the electric infrastructure to make the community more resilient against similar disasters in the future.</p>	<p>The County of Maui is dedicated to increasing the safety and resilience of Lahaina.</p> <p>The proposed programs will provide funding assistance to eligible undergrounding and grid hardening projects.</p>

		Commenters claimed this project would improve public safety and might help to prevent future fires.	
Water resources and infrastructure improvements	31	Comments received encouraged the County to use funds to improve water systems and sewer infrastructure to support housing and to mitigate against future disasters.	<p>Water resources are an essential part of Lahaina's infrastructure. The County will prioritize water infrastructure projects for CDBG-DR funding.</p> <p>The County is focused on using the CDBG-DR resources to leverage funding that can be used for identified projects, to maximize the impact on the affected community.</p>