



DR-4724-HI

Maui Wildfire Disaster Housing Strategy





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Background

On August 8, 2023, Acting Governor Sylvia Luke declared a state of emergency in the counties of Maui and Hawai'i and issued the Proclamation Relating to Wildfires.¹ At that point, several large wildfires were identified in the counties, including in the North Kohala, South Kohala, Kula, and Lahaina areas.

Then, on August 10, 2023, President Joseph Biden declared a major disaster in Hawai'i, DR-4724-HI.² This declaration provided federal funding to affected individuals in Maui County, including grants for housing, home repairs, low-cost loans, and recovery programs.³ On September 22, the president's disaster declaration was amended to include costs for debris removal and emergency measures.⁴

The fires in the counties of Maui and Hawai'i burned thousands of acres, forced evacuations, severed communication channels, and necessitated the shutdown of roads and schools. Maui County experienced substantial casualties and property destruction, leaving many individuals without shelter and the town of Lahaina destroyed.⁵ This wildfire incident period ended on September 30, 2023.⁶

The Governor's Office released additional emergency proclamations, which included:

- Second Proclamation Relating to Wildfires (August 9, 2023)
- Third Proclamation Relating to Wildfires (August 9, 2023)
- Fourth Proclamation Relating to Wildfires (August 10, 2023)
- Fifth Proclamation Relating to Wildfires (August 13, 2023)
- Sixth Proclamation Relating to Wildfires (August 19, 2023)
- Seventh Proclamation Relating to Wildfires (September 8, 2023)
- Eighth Proclamation Relating to Wildfires (November 6, 2023)
- Ninth Proclamation Relating to Wildfires (January 5, 2024)
- Tenth Proclamation Relating to Wildfires (March 5, 2024)
- Eleventh Proclamation Relating to Wildfires (May 3, 2024)

¹ <https://dod.hawaii.gov/hiema/governor-issues-emergency-proclamation-relating-to-wildfires/>

² <https://bidenwhitehouse.archives.gov/briefing-room/presidential-actions/2023/08/10/president-joseph-r-biden-jr-approves-hawaii-disaster-declaration-3/>

³ <https://bidenwhitehouse.archives.gov/briefing-room/presidential-actions/2023/08/10/president-joseph-r-biden-jr-approves-hawaii-disaster-declaration-3/>

⁴ <https://www.fema.gov/disaster-federal-register-notice/dr-4724-hi-maui-update-002>

⁵ <https://dod.hawaii.gov/hiema/files/2023/01/Ninth-Proclamation-Relating-to-Wildfires-2401019.pdf>

⁶ <https://www.fema.gov/disaster/4724#inactive-ia-status>



- Twelfth Proclamation Relating to Wildfires (July 2, 2024)
- Thirteenth Proclamation Relating to Wildfires (July 11, 2024)
- Fourteenth Proclamation Relating to Wildfires (July 12, 2024)
- Fifteenth Proclamation Relating to Wildfires (July 15, 2024)
- Sixteenth Proclamation Relating to Wildfires (July 19, 2024)
- Seventeenth Proclamation Relating to Wildfires (September 17, 2024)
- Eighteenth Proclamation Relating to Wildfires (October 8, 2024)
- Nineteenth Proclamation Relating to Wildfires (December 6, 2024)
- Twentieth Proclamation Relating to Wildfires (February 4, 2025)
- Twenty-First Proclamation Relating to Wildfires (April 4, 2025)

The Twenty-First Proclamation Relating to Wildfires remains in effect until June 3, 2025, unless terminated or superseded by another proclamation.

As of February 7, 2024, at the six-month anniversary of the disaster, the White House estimated that more than \$330 million in Federal grants and disaster loans have been provided towards support response and recovery efforts.⁷ Then, as of August 8, 2024, at the one-year anniversary of the disaster, the White House estimated that nearly \$3 billion in Federal support has been provided across response, recovery, and rebuilding efforts.⁸ On December 21, 2024, the Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118– 158), which allocated an additional \$1.6 billion in federal funds to the County of Maui, was approved by Congress.⁹

Housing Strategy Overview

The *Maui Wildfire Disaster Housing Strategy* aims to capture and memorialize the strategy for housing solutions in response to the wildfire disaster. This document outlines the ongoing responses to the Maui wildfires, detailing immediate sheltering operations, FEMA-approved housing assistance, and long-term housing solutions. To create a record of these recovery efforts, this document will be periodically updated to include all State of Hawai'i (State) and County of Maui (County) programs as they are developed and implemented.

⁷ <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/02/07/fact-sheet-six-months-after-maui-wildfires-biden-harris-administration-continues-to-support-survivors-and-impacted-communities/>

⁸ <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/08/08/fact-sheet-one-year-after-maui-wildfires-biden-harris-administration-continues-comprehensive-support-for-hawaii-families-and-communities/>

⁹ <https://www.congress.gov/118/bills/hr10545/BILLS-118hr10545enr.pdf>



This document primarily focuses on intermediate housing options (3 to 24 months post-incident) specific to the Maui wildfires. However, sheltering and permanent housing solutions are also described for context.

The following working groups previously met to discuss the programs outlined in this document:

- The Non-Congregate Sheltering (NCS) Task Force, led by the Hawai'i Emergency Management Agency (HI-EMA);
 - Effective July 2, 2024: The NCS Task Force discontinued recurring meetings in alignment with the end of state-managed NCS operations.
- The Joint Housing Task Force (JHTF) for Interim Housing, led by the County of Maui (previously led by the State prior to October 26, 2023);
 - Effective November 2024: The JHTF for Interim Housing discontinued recurring meetings.
- The Joint Housing Task Force (JHTF) for Permanent Housing, led by the County of Maui (previously led by the State prior to October 26, 2023).
 - Effective December 2024: The JHTF for Permanent Housing discontinued recurring meetings. The County indicated that the meetings may resume in the future.
- The FEMA/HI-ORR Operations Meeting
 - The weekly meetings, which included representatives from HI-ORR, FEMA Individual Assistance, and FEMA Information Management, provided an opportunity for FEMA and HI-ORR to coordinate on various topics, especially data-sharing and the prevention of duplicative benefits.

Effective March 19, 2025, the weekly meetings, which commenced on October 30, 2024, have been moved to an ad hoc basis.

In January 2024, the State, County, the Federal Emergency Management Agency (FEMA), the Council for Native Hawai'i an Advancement (CNHA), the Hawai'i Community Foundation (HCF), and the American Red Cross (ARC) entered into the Interim Housing Memorandum of Understanding (MOU), which is included as **Appendix E** to this document. The MOU details the allocation of \$500 million in funds.



Objectives

County, State, and Federal partners continue to work collaboratively to meet the needs of survivors. At the date of initial publication of this strategy document, November 1, 2023, the shared priority was to meet the sheltering needs of households. Moving forward, County, State, Federal, and Private partners are focused on transitioning households from sheltering to interim housing solutions (that are suitable for up to 24 months post-disaster) as well as establishing pathways to permanent housing solutions.

In this effort, the partners have identified key objectives to meet the sheltering and housing needs, including, but not limited to, the following:

1. Long-Term Suitability

Housing options should be well-suited for extended use, accommodating the unique composition and daily needs of households for a period of at least 24 months from the disaster declaration.

2. Community Value

Considering prudent financial management, preference should be given to housing options that positively impact the community beyond the immediate crisis.

- For example, partner agencies will consider locally sourced solutions and support originating in the impacted community to the extent possible.
- Partners will also consider how the infrastructure built or modified as part of the temporary housing solutions could potentially apply to permanent housing solutions as recovery efforts advance. For example, if a new road is required to transport materials to a temporary housing site, the road could potentially provide other long-term uses for the community (e.g., transportation route for permanent housing reconstruction, emergency evacuation route, etc.).

3. Reasonable Commute Time

It is vital that the selected housing solutions maintain an acceptable commute time for Maui residents to access essential services, such as schools, workplaces, transportation, grocery stores, medical facilities, places of worship, postal services, daycare, and laundry.

4. Continued Engagement

Some survivors may opt to temporarily stay with friends or family or choose other solutions that are not sustainable long-term. This document addresses survivors in this position as well as survivors who were placed in sheltering programs.



All-Encompassing and Iterative Approach

To achieve these objectives, the incident-specific interim housing strategy must consider and utilize all available housing options from federal, state, county, and non-governmental entities to meet the intermediate and long-term housing solutions for impacted individuals and households.

In coordination with the State, the Federal Emergency Management Agency (FEMA) identifies the individuals and households eligible for housing options provided by FEMA Individual Assistance programs. To achieve a complete and comprehensive housing recovery for Hawai'i, FEMA will utilize the housing programs, solutions, and resources available.

As of February 2025, the State and County expect the majority of housing placements for FEMA-eligible households in the following programs:

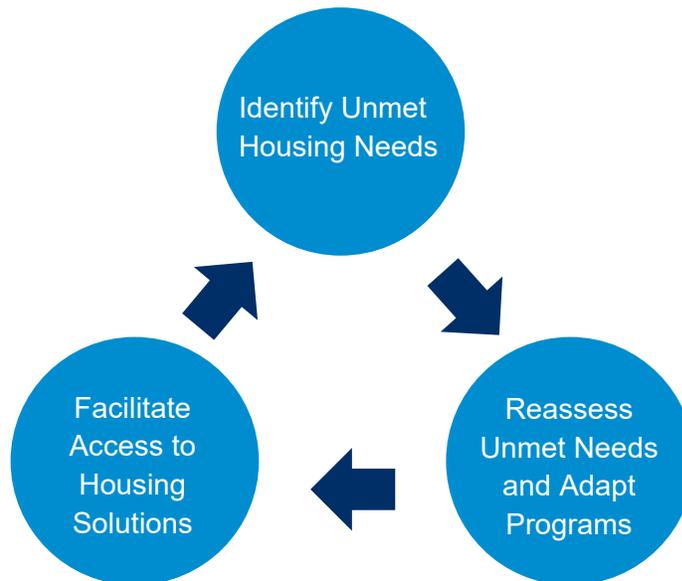
- FEMA Rental Assistance
- FEMA Direct Lease
- FEMA Group Site at Kilohana.

In some cases, a household may be ineligible for FEMA assistance and still have a need. In this case, the household may qualify for assistance from the State, County, or Private resources instead.

As of February 2025, the State expects the majority of housing placements for FEMA-ineligible households to be included in the Hawai'i Interim Housing Program.

This approach prioritizes FEMA programs and solutions. State, Local, and Non-Governmental Organization (NGO) resources will supplement FEMA programs to fill known gaps. This approach requires consistent stakeholder coordination, communication with survivors, and flexible leadership strategies from all partners.

Due to the dynamic nature of the incident and the need to ensure interim housing solutions that are more viable than temporarily staying with friends or family and more cost-effective than typical Non-Congregate Sheltering (NCS) solutions, the recovery effort requires a continuous outreach and housing tracking process. This process will be completed through multiple communication and tracking operations led by Maui County, the State of Hawai'i, FEMA, the US Department of Housing and Urban Development (HUD), and the American Red Cross (ARC). These operations will facilitate short- and long-term housing solutions aligned with the Joint Housing Task Force (JHTF) goals and objectives.



Critical to the housing goals and objectives is the Disaster Case Management Program (DCMP). A DCMP is a time-limited process that involves a partnership between a disaster case manager and a disaster survivor to develop and carry out an individual disaster recovery plan. This partnership provides individuals and households with a single point of contact to facilitate access to a broad range of available resources. The goal of the DCMP is to assist individuals and families through the recovery process by finding resources to meet their unmet disaster-caused needs.

DCMP services are available to any survivors impacted by the disaster, regardless of their eligibility for FEMA or other Federal assistance. The State, via the Department of Human Services (DHS), launched an interim DCMP on November 20, 2023.¹⁰ The State has since transitioned the interim DCMP to the FEMA-funded DCMP,¹¹ which launched on March 14, 2024.¹² . On August 28, 2024, FEMA awarded DHS an additional \$7.9 million in DCMP funding to expand recovery support and access to resources for wildfire survivors.¹³ To encourage

¹⁰ <https://humanservices.hawaii.gov/blog/state-of-hawaii-department-of-human-services-launches-interim-disaster-case-management-program/>

¹¹ <https://humanservices.hawaii.gov/blog/dhs-announces-four-community-based-organizations-awarded-to-participate-in-the-disaster-case-management-program/>

¹² <https://humanservices.hawaii.gov/state-of-hawaii-department-of-human-services-launches-disaster-case-management-program/>

¹³ <https://humanservices.hawaii.gov/fema-awards-dhs-additional-7-9-million-in-disaster-case-management-funding-to-expand-recovery-support-and-access-to-resources-for-maui-wildfire-survivors/>



community engagement, DHS hosted a DCMP survivor outreach event on September 22, 2024.¹⁴

Until June 30, 2024, the ARC provided Shelter Resident Transition (SRT), a casework program designed to work with survivors to transition them out of shelters. The program combined specially trained caseworkers, flexible financial assistance, and partnerships, including the JHTF. The caseworkers helped Non-Congregate Shelter (NCS) households with unmet needs. At the same time, in the NCS hotels, the caseworkers developed recovery plans that helped survivors execute transition solutions until the end of state-managed NCS.

¹⁴ <https://humanservices.hawaii.gov/dhs-hosts-disaster-case-management-program-outreach-event-for-maui-wildfire-survivors-in-need-of-support/>



Sheltering

American Red Cross (ARC) Congregate Sheltering (CS)

This sheltering option was administered by the ARC and funded by FEMA, provided traditional, temporary overnight sheltering in facilities with large open spaces in which many bunks, cots, or mats were placed for sleeping.¹⁵ The shelters operated until August 21, 2023.

Hawai'i Fire Relief Program

This Hawai'i Housing Finance and Development Corporation (HHFDC) program connects those in urgent need of housing due to the Maui fires with Hawai'i homeowners willing to assist by offering unoccupied extra rooms, the 'ohana units or accessory dwelling units (ADUs) in their homes, vacation rentals, or whatever safe and secure rooms they have available on a temporary basis. The State of Hawai'i Fire Relief Housing Program has merged with the [HelpingMaui.org](https://www.helpingmaui.org) initiative that is being operated by the Council for Native Hawaiian Advancement (CNHA) as the Kāko'o Maui Housing Program (see additional information under [Interim Housing](#) in the next section).¹⁶

Airbnb

The Department of Human Services (DHS), Maui Economic Opportunity (MEO), and the ARC coordinated with Airbnb to locate shelters for households through November 30, 2023. ARC assisted in the transitions for households at the end of the program.^{17,18}

State-Managed Non-Congregate Sheltering (NCS)

NCS was overseen by the State, administered by the ARC, and provided shelter to survivors. Under the Public Assistance program, FEMA reimburses NCS costs for households that meet their eligibility criteria, which include the following: the household is in an area declared for FEMA Individual Assistance, the household is registered with FEMA Individual Assistance and has not requested to withdraw, the household can document pre-disaster status as an owner or renter of the primary residence, and the household's primary residence is not habitable.¹⁹ State-managed NCS was authorized by FEMA through June 30, 2024. (Please note that the State

¹⁵ <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/08/30/fact-sheet-biden-harris-administrations-latest-actions-to-support-communities-impacted-by-maui-wildfires-4/>

¹⁶ <https://dbedt.hawaii.gov/hhfdc/hawaii-fire-relief-housing-program/>

¹⁷ <https://governor.hawaii.gov/newsroom/office-of-the-governor-news-release-maui-wildfire-survivors-successfully-moved-from-shelters-into-hotels-timeshares-and-airbnb-units/>

¹⁸ <https://governor.hawaii.gov/newsroom/dhs-reminds-public-airbnb-space-is-still-avaialbe-deadline-to-register-approaching/>

¹⁹ https://www.fema.gov/sites/default/files/documents/fema_memo-emergency-non-congregate-sheltering.pdf



covered costs for households in the NCS program that are determined to be ineligible for NCS by FEMA.)

FEMA Direct Federal Assistance Non-Congregate Sheltering (DFA NCS)

On June 11, 2024, FEMA authorized the transition of eligible households from state-managed NCS to FEMA’s DFA NCS on a cost share basis with the State. FEMA transitioned households that were awaiting placement in a FEMA unit. FEMA transitioned the remaining households from DFA NCS to housing solutions by June 30, 2024.

Pu’uhonua o Nēnē

On September 29, 2023, Hawai’i Governor Josh Green and Project Vision Hawai’i (PVH) opened Pu’uhonua o Nēnē, a temporary shelter for Maui wildfire survivors experiencing homelessness before the disaster. The shelter includes multiple military-grade tents that can house approximately 150 people. Each tent is fully insulated and equipped with cots and other supplies. Meals, transportation, on-site medical facilities, showers, and restrooms have also been provided.²⁰

Interim Housing

Temporary Assistance for Needy Families (TANF)

DHS, in partnership with Maui Economic Opportunity Inc., started the Maui Relief Temporary Assistance for Needy Families (TANF) Program on October 20, 2023, to provide up to four months of financial support for families directly affected by the wildfires. The program is designed to assist families with at least one dependent child. The Maui Relief TANF Program is separate from the ongoing TANF cash assistance benefit and has a different application process, eligibility criteria, and requirements. To qualify for the Maui Relief TANF Program, a family must have suffered property loss or damage or reduction of earnings or employment as a direct result of the emergency, have at least one dependent child in the family, and meet income eligibility guidelines.²¹ The program is funded with the DHS Temporary Assistance for Needy Families federal block grant and private funds.²² The State has allocated up to \$100 million in funds for this resource.

Hawai’i Interim Housing Program (HIHP)

In July 2024, the State launched the Interim Housing Program application portal. The State will place households based on applications received through the online portal or contact center.²³

²⁰ <https://humanservices.hawaii.gov/blog/governor-green-announces-temporary-shelter-for-houseless-wildfire-survivors/>

²¹ <https://humanservices.hawaii.gov/blog/governor-green-announces-application-date-for-maui-relief-tanf-program/>

²² <https://www.meoinc.org/maui-relief-tanf-program-online-applications-will-open-friday/>

²³ <https://dbedt.hawaii.gov/hhfdc/hawaiistatererecovers-shihp-faq/>



Households must meet the eligibility criteria, which include documenting proof of identity, proof of occupancy at a pre-disaster address, and proof of disaster impact. Each adult household member is required to pass a background check. Applicants placed in a unit will not be asked to contribute to rent or utility payments through August 2025.

As of January 15, 2025, the application portal closed. The State continues to process applications received before the portal closure. For details, please refer to **Appendix F**.

[Hale 'O Lā'ie](#)

On February 8, 2024, the State legislature appropriated funds to the Hawai'i Housing Finance and Development Corporation (HHFDC) to convert the former Maui Sun Hotel into affordable and teacher workforce housing and preschool classrooms.²⁴ 160 units are allocated for HIHP-eligible households. HIHP-eligible households started moving into their units in August 2024.²⁵ As of February 2025, over 100 units, of the 160 units, house HIHP applicant households.²⁶

[Ka La'i Ola](#)

The State and County is in the process of building interim housing for survivors in Ka La'i Ola. As of February 2025, over 150 units house HIHP applicant households.²⁷ The State plans to construct up to 450 total units on the site.

[Rental Assistance Program \(RAP\)](#)

On December 1, 2023, Governor Josh Green and DHS announced a rental assistance program for survivors of the Maui wildfires who cannot access FEMA assistance.²⁸ With \$2.5 million in initial funding, the program engages with Airbnb and the HHFDC's Hawai'i Fire Relief Housing Program to aid survivors with housing solutions for twelve (12) months. RAP is facilitated by the community-based organization Global Empowerment Mission in collaboration with Airbnb.²⁹ RAP operated independently to HIHP prior to its incorporation into HIHP in October 2024. As of February 2025, over 180 applicant households are in RAP.³⁰

[DHS Housing Support GAP Fund](#)

DHS, in partnership with the Council for Native Hawaiian Advancement (CNHA), provides rental assistance to eligible applicants through the DHS Housing Support GAP fund. This fund may

²⁴ https://dbedt.hawaii.gov/hhfdc/files/2024/02/2024-0208-III.E-Haggai_County-MOA-Ground-Lease-SECURED.pdf

²⁵ <https://governor.hawaii.gov/newsroom/office-of-the-governor-news-release-gov-green-announces-first-wildfire-survivor-move-ins-at-hale-o-laie/>

²⁶ HI-ORR internal data as of 2/10/2025.

²⁷ HI-ORR internal data as of 2/10/2025.

²⁸ <https://humanservices.hawaii.gov/blog/dhs-rental-assistance-program-rap-faqs/>

²⁹ <https://humanservices.hawaii.gov/blog/state-of-hawaii-department-of-human-services-launches-2-5m-rental-assistance-program/>

³⁰ HI-ORR internal data as of 2/10/2025.



provide housing support to applicants who already have a lease or are able to find an available rental and have an unmet interim housing need. DHS, via CNHA, sends the assistance payment to the property owners directly. This fund allocates a maximum of 12 months of assistance to an applicant with a monthly funding cap of \$2,500. As of February 2025, 12 applicant households were referred to the fund from HIHP.³¹

Unit Placement in Private Sites

Within HIHP, DHS will place 18 temporary prefabricated residential units on privately owned sites. The units will house HIHP-eligible applicants. HI-ORR will provide oversight support to DHS.

Residential Dwelling Unit (RDU) Program

As of February 2025, the RDU Program is paused. The RDU Program was designed to install temporary prefabricated residential units on property owned by eligible HHIP applicants. The intention of the program was to provide an alternative option to HIHP applicants who would prefer to return to their pre-disaster properties. Participation would be limited to homeowners in HIHP because the unit will be placed on private property. Program implementation began in November 2024 and was coordinated by HI-ORR. In December 2024, HIHP launched a call campaign to gauge initial interest from homeowners. Based on this call campaign, 111 out of 185 property owners indicated interest in learning more about the RDU Program. The RDU Program was paused on February 10, 2025 and transferred from HI-ORR to the DHS on February 27, 2025, for further direction and execution, if any.

A summary of work completed prior to the pause is included in Appendix G.

Additional Sites

The State will incorporate additional sites into the program as they become available.

Host Housing Support Program

The Host Housing Support Program provided financial assistance to households offering housing to individuals and families displaced by the Maui wildfires. During the initial phase, qualifying host households received financial support of \$500 per person each month, depending on the size of the displaced family they are accommodating. Hosts received a monthly stipend of up to \$2,000, which could be extended for up to 6 months.³² This program was funded by the American Red Cross and the Hawai'i Community Foundation in partnership

³¹ HI-ORR internal data as of 2/10/2025.

³² <https://www.hawaiiancouncil.org/hostfamily/>



with the County and the Council for Native Hawaiian Advancement (CNHA). The application period for this program is now closed.³³ The program ended operations in November 2024.

Kāko'o Maui Housing Program

The Hawai'i Fire Relief Housing Program has merged with the [HelpingMaui.org](https://www.helpingmaui.org) initiative operated by the Council for Native Hawai'i and Advancement (CNHA) as the Kāko'o Maui Housing Program.³⁴ CNHA launched a centralized housing website to help survivors find housing while also serving as a platform for property owners and managers to offer their properties to survivors. Hawai'i homeowners can assist those needing housing by offering spare rooms or living space, short-term rentals, long-term rentals, second homes, or accessory dwelling units (ADUs). As of April 2024, the program has housed over 300 households.

La'ikū

La'ikū has been developed in partnership between the Hawai'i Department of Transportation (HDOT), the Hawai'i Department of Education (DOE), the Council for Native Hawaiian Advancement (CNHA), and the Hawai'i Community Foundation (HCF) Maui Strong Fund. La'ikū will provide sixteen (16) two-bedroom, one-bath units at 560 sq. ft. each. The homes were built on approximately two acres of land that was previously acquired by the HDOT as part of the Lahaina Bypass project. In July 2024, the initial households moved into La'ikū.^{35,36} As of March 2025, all units have been filled.

FEMA Rental Assistance

FEMA offers rental assistance to eligible survivors who cannot return to their pre-disaster primary residence because the property is uninhabitable, cannot be accessed, or is unavailable due to the wildfires, and the household does not have other resources for housing.³⁷ Households that received FEMA Rental Assistance may be eligible for Continued Temporary Housing Assistance through FEMA.^{38,39}

FEMA Direct Lease

FEMA continues to work with property management companies to lease residential properties, including single-family homes, multi-unit homes, and apartments, to use as temporary housing

³³ <https://councilfornativehawaiianadvanceme2.my.site.com/s/host-housing-support-program>

³⁴ <https://dbedt.hawaii.gov/hhfdc/hawaii-fire-relief-housing-program/>

³⁵ <https://governor.hawaii.gov/main/new-housing-project-laiku-welcomes-maui-wildfire-survivors/>

³⁶ <https://governor.hawaii.gov/newsroom/office-of-the-governor-news-release-gov-green-and-community-leaders-meet-with-new-laiku-residents-in-lahaina/>

³⁷ <https://www.fema.gov/fact-sheet/continued-rental-assistance-maui-wildfire-survivors>

³⁸ <https://www.fema.gov/fact-sheet/continued-temporary-housing-assistance-available-wildfire-survivors>

³⁹ <https://www.fema.gov/press-release/20250122/faq-fema-housing-programs>



for survivors.⁴⁰ FEMA approved Direct Lease assistance in the September 13, 2023, Direct Housing Approval Memo.

On August 21, 2023, FEMA issued a Request for Information (RFI) for Direct Lease. A Request for Proposal (RFP) was issued on September 26, 2023, which yielded nearly 100 total Direct Lease units at 175 percent of the HUD's Fair Market Rate (FMR). A contract for Direct Lease has been awarded to three property management companies.⁴¹

As of March 1, 2025, survivors will be required to contribute rent toward their unit. The rental requirement will be in effect for the remainder of the program, which has been extended through February 10, 2026. To determine rental amounts, FEMA assessed both the U.S. Department of Housing and Urban Development's 2025 Fair Market Rent in Maui and the survivor household's ability to pay.⁴²

FEMA Micro-sites

FEMA is working with the County of Maui in developing a plan to engage residential property owners who do not maintain their property (in the County of Maui) as their primary residence. FEMA is developing a plan to lease parcels from the property owners for Alternative Transportable Temporary Housing Units, which FEMA could then utilize to house survivors, such as renters who will not have the option to return to their pre-disaster unit.

FEMA is working with the County of Maui and residential property owners who do not maintain their property (in the County of Maui) as their primary residence to place Alternative Transportable Temporary Housing Units (ATTHUs) on secondary private properties to house survivors. ATTHUs are prefabricated, furnished one-, two-, or three-bedroom units.

FEMA intends to lease vacant lots from property owners who do not intend to rebuild on them within the next two to three years. The property will be assessed for use by the U.S. Army Corps of Engineers and reviewed by FEMA. In particular, FEMA is looking for properties that allow for the placement of two or more temporary units within the West Maui area.⁴³

FEMA ATTHUs for Homeowners

FEMA has initiated outreach to private homeowners to place temporary housing units on their property while they rebuild their home. The Alternative Transportable Temporary Housing Units (ATTHUs) will be provided at no cost to eligible survivors as furnished one-, two- or three-bedroom units.

⁴⁰ <https://www.fema.gov/fact-sheet/rental-properties-wanted-temporary-disaster-housing>

⁴¹ <https://www.fema.gov/fact-sheet/frequently-asked-questions-about-femas-direct-lease-program>

⁴² <https://www.fema.gov/press-release/20250205/reminder-rental-requirement-begins-march-1st-direct-housing-participants>

⁴³ <https://www.fema.gov/press-release/20250122/fema-working-place-temporary-housing-units-privately-owned-vacant-lots>



FEMA is specifically engaging with private homeowners who lost their primary home in the wildfires, are eligible for FEMA Direct Housing, and have not yet secured housing. FEMA will contact these homeowners to determine if they would like a no-cost, temporary unit placed on their property. Space, sewer or septic system capacity, and electric power for a temporary unit are factors for consideration. To date, FEMA has solicited bids from contractors who can install these temporary housing units on private properties.^{44,45}

FEMA Site at Kilohana

The Kilohana site is situated on approximately 34 acres at Fleming Road. FEMA has completed construction of 167 temporary houses at the site. The houses are a mix of one-, two- and three-bedroom modular units. According to FEMA, the modular homes have been built to last 30 years or more and meet the International Building Code and local amendments. The units were shipped from the continental United States, with the initial 10 units arriving in the fall of 2024. The first survivor households moved on November 24, 2024. Construction continued through the winter. Then, in February 2025, FEMA completed construction of all remaining units.⁴⁶ All units were occupied as of February 2025.

U.S. Department of Agriculture (USDA) Disaster Programs

USDA provides grants and loans to eligible homeowners in rural areas that were impacted by a presidentially declared disaster.⁴⁷ Generally, funds are available for disaster-related home repair expenses and site preparation.

Permanent Housing and Infrastructure

HIHP-to-Home Program

The Hawai'i Interim Housing Program to Home Program (HIHP-to-Home Program) aims to transition 100 HIHP households to permanent housing solutions.

The proposed solutions, which are not yet confirmed, prioritize first-time homeownership opportunities and sustainable community development, with the following key components:

1. Converting Interim Housing to Permanent Housing: Transforming existing lots at Ka La'i Ola, which is an interim housing site under HIHP, into permanent homes, ensuring a seamless transition for current applicants while preserving their community ties.

⁴⁴ <https://www.fema.gov/press-release/20240628/fema-continues-expand-housing-options-survivors>

⁴⁵ <https://www.fema.gov/fact-sheet/weekly-fact-sheet-oct-22-2024>

⁴⁶ <https://www.fema.gov/press-release/20250204/fema-completes-167-temporary-homes-lahaina-wildfire-survivors>

⁴⁷ <https://www.rd.usda.gov/programs-services/single-family-housing-programs/single-family-housing-rural-disaster-home-repair-grants>



2. Deploying Permanent Homes: Installing high-quality housing on available lots in Lahaina to provide fast, cost-effective, and durable housing options.

3. Developing Affordable Rental Housing: Initiating small-scale affordable rental projects to support diverse housing needs while fostering long-term affordability and stability.

The program is expected to leverage CDBG-DR funds although the funding sources have not been confirmed to date.

Additional State and County Efforts

The State and County are working collaboratively to develop permanent housing options for households. While some households will be able to return to their pre-disaster primary residences, there will likely be households that need permanent housing options through State and County assistance.

It is understood that the development of permanent housing solutions will require a significant investment in infrastructure repair and creation. The State is committed to collaborating with the County to identify and invest in the appropriate infrastructure to support repopulation.

For details on projects, please refer to **Appendix A**.

Potential Federal Resources for Housing

The State and County are evaluating potential options for federally funded housing programs beyond the assistance already received.

FEMA Permanent Housing Construction (PHC)

Permanent Housing Construction (PHC) provides financial or direct assistance (e.g., repairs vs. new construction) to construct permanent or semi-permanent housing in insular areas or outside of the continental United States (OCONUS). Repair and/or new construction may be considered when no alternative housing resources are available and all forms of Direct Temporary Housing Assistance are unavailable, infeasible, or not cost-effective.⁴⁸ FEMA will only authorize PHC in response to a written request from the State. To date, PHC has not been authorized for this incident.

FEMA Hazard Mitigation Grant Program (HMGP)

FEMA's Hazard Mitigation Grant Program provides funding to state governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in their communities. Hazard mitigation includes long-term efforts to reduce risk and the

⁴⁸ https://www.fema.gov/sites/default/files/documents/fema_iappg-1.1.pdf



potential impact of future disasters. For example, HMGP may fund structural retrofits to make a building, utility, or other infrastructure more resistant to wildfires and other natural hazards.⁴⁹

HI-EMA submitted their Notice of Intent to apply in 2024.⁵⁰

HUD Community Development Block Grant Disaster Recovery (CDBG-DR)

After a disaster, Congress may provide funding to the U.S. Department of Housing and Urban Development (HUD) to distribute via Community Development Block Grant Disaster Recovery (CDBG-DR) funds. Funds may also be allocated to mitigate future disaster risks and losses by implementing high-impact activities.⁵¹

The Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118– 158), which is also referred to as the 2025 Appropriations Act, was approved on December 21, 2024.⁵² In this act, Congress allocated over \$12 billion CDBG–DR funds of which over \$1.6 billion was allocated to the County of Maui.

On January 16, 2025, HUD’s Office of the Assistant Secretary for Community and Planning Development published the Allocations for CDBG-DR and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice (Docket No. FR–6512–N–01). The Applicability date of the Federal Register Notice was January 21, 2025.⁵³

In March 2025, The County of Maui hosted three public meetings to collect public feedback on their draft Action Plan.

This strategy document will be updated as the County of Maui releases details about how the County plans to fund housing programs with the CDBG-DR allocation.

⁴⁹ <https://www.fema.gov/grants/mitigation/hazard-mitigation>

⁵⁰ <https://dod.hawaii.gov/hiema/hazard-mitigation-grants/>

⁵¹ https://www.hud.gov/program_offices/comm_planning/cdbg-dr

⁵² <https://www.congress.gov/118/bills/hr10545/BILLS-118hr10545enr.pdf>

⁵³ <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>



Document Maintenance

This document establishes a record of sheltering and housing programs related to the wildfires. By keeping this document updated with information about all State and County programs, collaborators can ensure the recovery operation is dynamic, responsive, and effective.

Once a quarter, this document will undergo a review period. During this time, The State Disaster Recovery Coordinator, in partnership with JHTF and Long-Term Housing Recovery Support Function, will lead the review of the document to ensure that it is accurate and current.

The document will undergo an approval process after each review.

Version	Date	Significant Changes	Approved
0	November 1, 2023	Initial version	
1	February 28, 2024	Updated program descriptions	
2	April 23, 2024	Updated background, updated program names, incorporated recent NCS documents	Luke Meyers Digitally signed by Luke Meyers Date: 2024.05.03 12:42:02 -10'00'
3	July 18, 2024	Updated background and program descriptions, incorporated recent NCS documents, incorporated HIHP policy	Luke Meyers Digitally signed by Luke Meyers Date: 2024.07.22 11:37:55 -10'00'
4	September 20, 2024	Updated overview, updated Interim Housing program descriptions, incorporated correspondence records into Appendices C and D, updated Appendix F, and created Appendix J	Luke Meyers Digitally signed by Luke Meyers Date: 2024.09.27 06:06:22 -10'00'
5	May 21, 2025	Updated overview, updated program descriptions, updated appendices	



Appendix A

Housing Pipeline

[Link to Document](#)



Appendix B

Sheltering, Interim and Permanent Housing Chart

Sheltering, Interim, and Permanent Housing Overview

Current as of March 13, 2025
Hawai'i State Fiscal Year

		FY24 Jul 1, 23—Jun 30, 24	FY25 Jul 1, 24—Jun 30, 25	FY26 Jul 1, 25—Jun 30, 26	FY27 Jul 1, 26—Jun 30, 27	FY28 Jul 1, 27—Jun 30, 28
Sheltering	Congregate Shelters	█				
	AirBnB	█				
	State-Managed Non-Congregate Sheltering	█				
	FEMA Direct Federal Assistance Non-Congregate Sheltering	█				
	Pu'uhonua o Nēnē	█	█	█		
Interim	Temporary Assistance for Needy Families		█	█	█	█
	Hawai'i Interim Housing Program		█	█	█	█
	Hale 'O Lā'ie		█	█	█	
	Ka La'i Ola		█	█	█	█
	Rental Assistance Program		█	█	█	
	DHS Housing Support GAP Fund		█	█		
	Host Housing Support Program		█	█		
	Kāko'o Maui Housing Program		█	█		
	La'ikū		█	█	█	█
	FEMA Rental Assistance		█	█	█	
	FEMA Direct Lease		█	█		
	FEMA Micro-sites		█	█	█	█
	FEMA Alternative Transportable Temporary Housing Units for Homeowners		█	█		█
	FEMA Kilohana		█	█	█	█
Permanent	Infrastructure (to support permanent housing projects)		█	█	█	█
	Debris Removal and Other Mobilization Costs		█	█		
	Lahaina Rebuild		█	█	█	█



Appendix C

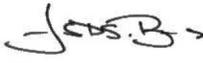
FEMA Housing Documentation

Subject	Date of Letter	Sender
Request for Transitional Sheltering Assistance	08/12/2023	HI-EMA
Request to Increase Rental Assistance	08/13/2023	HI-EMA
Request for Direct Housing Assistance	08/30/2023	HI-EMA
Request for Section 425 Transportation Assistance	08/31/2023	HI-EMA
Request for Critical Needs Assistance	09/06/2023	HI-EMA
Request for Clean and Sanitize Assistance	09/12/2023	HI-EMA
Direct Housing Approval for FEMA-4724-DR-HI	09/13/2023	FEMA
Request to Extend Individual Assistance Deadline	09/23/2023	HI-EMA
Critical Needs Assistance Extension Approval	09/25/2023	FEMA
Clean and Sanitize Assistance Approval	09/27/2023	FEMA
Individual Assistance Deadline Extension Approval	10/02/2023	FEMA
Section 425 Transportation Assistance Approval	10/11/2023	FEMA
Request to Extend Individual Assistance Deadline	11/02/2023	HI-EMA
Individual Assistance Deadline Extension Approval	11/08/2023	FEMA
Request for IHP – Other Needs Assistance	11/30/2023	HI-EMA
Request for Permanent Housing Construction Denial	12/22/2023	FEMA
Request to Place Alternative Transportable Temporary Housing Units (ATTHU) on Group Sites in the County of Maui – Kaanapali 2020 and Waikapu Country Town	12/28/2023	HI-EMA
IHP – Other Needs Assistance Approval	01/08/2024	FEMA
Request for ATHUs	01/30/2024	Governor, Mayor, and Congressional Representatives

Subject	Date of Letter	Sender
Temporary Housing Sites	04/01/2024	Governor & Mayor
Request for Cane Haul Road	04/24/2024	Governor
DR-4724-HI Individuals and Households Program (IHP) Extension Request	08/13/2024	HI-EMA

August 12, 2023

MEMORANDUM FOR: Mr. Maona N. Ngwira
Federal Coordinating Officer
FEMA 4724-HI-DR-ST

FROM: James DS. Barros 
State Coordinating Officer
State of Hawaii

SUBJECT: Transitional Sheltering Assistance Request
FEMA-4724-DR-HI

The State of Hawaii has requested Transitional Sheltering Assistance (TSA) for FEMA-4724-DR-HI be activated for 180 days from the date of the Major Disaster declaration. The State requests that the activation/extension of TSA due to wildfires.

I understand FEMA's Recovery Policy FP 104-009-5: Transitional Sheltering Assistance (June 1, 2021) indicates TSA may be activated when survivors are displaced, their homes are damaged and / or inaccessible and sheltering is insufficient to meet their longer-term shelter needs for up to 180 days after the date of the Emergency or Major Disaster declaration. Due to wildfires, survivors from the County of Maui face challenges getting back in their homes or finding adequate rental or other temporary housing resources. Current rental resources are limited and demand exceeds rental housing availability throughout the county. The other counties of Kauai, Honolulu and Hawaii face the same rental housing challenges.

Presently there are over 1,350 people on six shelters. As over 100 homes were destroyed, rebuilding is expected to take several years. The State has assessed the immediate need for sheltering as the result of the disaster-caused damage to homes. Providing safe, non-congregate sheltering allows displaced household to make repairs to return home or to find alternate housing options as they continue their recovery.

The State will continue to coordinate available housing option to support transition to long-term solutions.

State of Hawaii acknowledges TSA is a short-term sheltering solution until other temporary or permanent housing solutions can be implemented. Based on the accompanying resource request form (RRF), the State of Hawaii acknowledges and accepts the applicable State cost share.

Should you or your staff have any questions, please contact Lorinda Wong-Lau, Recovery Officer, for coordination purposes], at 808-620-5410.

Attachment:

1. Resource Request Form (RRF)

DEPARTMENT OF HOMELAND SECURITY
 Federal Emergency Management Agency
RESOURCE REQUEST FORM (RRF)

O.M.B. No. 1660-0002
 Expires May 31, 2017

PAPERWORK BURDEN DISCLOSURE NOTICE

Public reporting burden for this form is estimated to average 20 minutes per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting this form. This collection of information is required to obtain or retain benefits. You are not required to respond to this collection of information unless it displays a valid OMB control number. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing this burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472-3100, Paperwork Reduction Project (1660-0047). **NOTE: Do not send your completed form to this address.**

I. REQUESTING ASSISTANCE (To be completed by Requestor)

1. Requestor's Name (Please print) James DS. Barros	2. Title Governor's Authorized Representative	3. Phone No. 808-733-4300
4. Requestor's Organization Hawaii Office of Emergency Management	5. Fax No. 808-733-4287	6. E-Mail Address James.Barros@hawaii.gov

II. REQUESTING ASSISTANCE (To be completed by Requestor)

1. Description of Requested Assistance:
 Request 180 day activation of FEMA's Transitional Sheltering Assistance (TSA) for Wildfires (4724-DR-HI). Estimated assistance is for 1,000 disaster survivors not to exceed 1,000 rooms per night. Counties include: Maui. State has requested the GSA Lodging Rate be applied at _____

2. Quantity 1,000 survivors	3. Priority <input type="checkbox"/> Lifesaving <input type="checkbox"/> High <input checked="" type="checkbox"/> Life Sustaining <input type="checkbox"/> Normal	4. Date and Time Needed Specify 08-12-23 / 1200
5. Delivery Site Location JFO Location	6. Site Point of Contact (POC) Jesus Ceja	7. 24 Hour Phone No. 202-805-6724
9. State Approving Official Signature 		8. Fax No.
		10. Date and Time Aug 12, 2023

III. SOURCING THE REQUEST - REVIEW/COORDINATION (Operations Section Only)

1. <ul style="list-style-type: none"> <input type="checkbox"/> OPS Review by: _____ <input type="checkbox"/> LOG Review by: _____ <input type="checkbox"/> Other Coordination: _____ <input type="checkbox"/> Other Coordination: _____ <input type="checkbox"/> Other Coordination: _____ 	2. Source: <ul style="list-style-type: none"> <input type="checkbox"/> Donations <input checked="" type="checkbox"/> Other (Explain) <input type="checkbox"/> Requisitions <input type="checkbox"/> Procurement <input type="checkbox"/> Interagency Agreement <input type="checkbox"/> Mission Assignment 	3. Assigned to: <ul style="list-style-type: none"> ESF/OFA: _____ RSF/OFA: _____ Other: _____ Date/Time: _____
4. Immediate Action Required <input type="checkbox"/> Yes <input type="checkbox"/> No		

IV. STATEMENT OF WORK (Operations Section Only)

1. OFA Action Officer	2. 24 Hour Phone #	3. Fax #
4. FEMA Project Manager	5. 24 Hour Phone #	6. Fax #
7. Statement of Work Activate TSA for XX days for [Incident Name] (XXXX-DR-ST Abbrev). Estimated assistance is for X,XXX disaster survivors for XX days not to exceed XX rooms per night. Costs estimated based on the \$XXX.00 per night (GSA Lodging Rate for primary declared jurisdiction). Pursuant to the FEMA's TSA policy, the per night cost of each room will not exceed XXX% [Insert waiver amount if requested] of the GSA schedule. CLC Lodging will manage the interaction with participating facilities and handle all invoicing by hotels. Estimated Total Program _____		<input type="checkbox"/> See Attached
8. Estimated Completion Date	9. Estimated Cost \$XX,XXX,XXX.00	

V. ACTION TAKEN (Operations Section Only)

Accepted
 Rejected
 Requestor Notified

Reason / Disposition

RESOURCE REQUEST FORM (RRF)

TRACKING INFORMATION (FEMA Use Only)

ECAPS/NEMIS Task ID:	Resource Request #	Program Code/Event #	<input type="checkbox"/> Originated as verbal
Received by (Name and Organization)	State	Date/Time Received	

INSTRUCTIONS

Items on the Resource Request form that are not specifically listed are self-explanatory. Indicate "see attached" in any field for which additional space or more information is required.

I. Who is requesting assistance? Completed by requestor.

II. What needs to be done? Completed by requestor.

Description of Requested Assistance: Detail of resource shortfalls, statement of deliverable, or simply state problem/need.

Priority: The requestor's priority, which may differ from the priority in BOX III.

Site POC: The person at the delivery site coordinating reception and utilization of the requested resources. 24-hour contact information required.

If for Direct Federal Assistance (DFA), State Approving Official: Signature certifies that:

- (1) State and local governments cannot perform, nor contract for the performance of the requested work;
- (2) Work is required as a result of the event, not a pre-existing condition; and
- (3) The State is providing the required assurances found in 44 CFR, Section 206.208.

III. Action Review/Coordination (OPS Section Use Only): Completed by the Operations Section Chief or Resource Capability Branch Director.

Accept/Reject: Operations Section Chief or Resource Capability Branch Director accepts or rejects the request; provide reason if rejection. If request accepted, coordinates with others, i.e., Branch Directors or Group Supervisors, begins to determine best means of fulfilling request. All involved in coordination should check appropriate box and initial or print their name.

Assigned to: Operations Section Chief or Resource Capability Branch Director assigns tasks origination, may indicate the OFA Action Officer. Operations Section Chief may also indicate the Action Officer if known, or tasked organization may make this assignment. This may be Emergency Support Function, internal FEMA Organization (i.e.; Logistics), or other organization.

Date/Time Assigned: Operations Section Chief or Resource Capability Branch Director provides date and time of when sourcing should begin.

IV. Statement of Work (OPS Section Use Only): Completed by the Operations Section Chief or Resource Capability Branch Director.

OFA Action Officer: Ops Section Chief obtains from OFA if request fulfilled by a MA; 24-hr phone/fax required. Information used in eCAPS.

FEMA Project Manager: Provided by Operations Section Chief; a Region PFT; 24-hr phone/fax required. Information used in eCAPS.

Statement of Work: Description of tasks to be performed. Could be to assess a problem and report back, or could be to proceed with a specific action. If 40-1 or MA, this goes in "justification" tab in eCAPS.

V. Action Taken (OPS Section Use Only): Completed by Operations Section Chief, Resource Capability Branch Director, MA Unit or Logistics.

Resource Request Results: Ops Section Chief, Resource Support Section Chief, MA Unit, or LOG should note what type of document the action resulted in by "checking" the appropriate box i.e., Mutual Aid, Donations, Requisition, Procurement, IA, MA, Other. If "Other" is selected write in appropriate response or state "see below" and give detail description in "Disposition" field. "Disposition" field should note steps taken to complete the Action, and personnel, sub-tasked agencies, contracts and other resources utilized.

TRACKING INFORMATION. Completed by Action Tracker. Required for all requests.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

August 13, 2023

Mr. Maona N. Ngwira
Federal Coordinating Officer
DR-4724-HI
4202 Diamond Head Road
Honolulu, HI 96816

Dear Mr. Ngwira:

The State of Hawaii requests that FEMA increase the Rental Assistance rate to 125% of the U.S. Department of Housing and Urban Development's (HUD's) published Fair Market Rent (FMR) for eligible applicants in the County of Maui.

Current rental resources are limited and demand exceeds rental housing availability throughout the county. The other counties of Kauai, Honolulu and Hawaii face the same rental housing challenges. Presently there are over 1,350 people on six shelters. As over 100 homes were destroyed, rebuilding is expected to take several years.

We understand an increase to the Rental Assistance rate will be implemented upon an eligible applicant's initial payment of Continued Temporary Housing Assistance in accordance with the Individual Assistance Program and Policy Guide (IAPPG) Version 1.1, Chapter 3, Section IV.D. We also understand FEMA does not retroactively award increased initial Rental Assistance.

Sincerely,

JAMES DS. BARROS
Administrator
Hawaii Emergency Management Agency

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
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PHONE (808) 733-4300
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

August 30, 2023

Maona N. Ngwira
Federal Coordinating Officer
Federal Emergency Management Agency

Dear Mr. Ngwira:

Subject: Request for Direct Housing Assistance

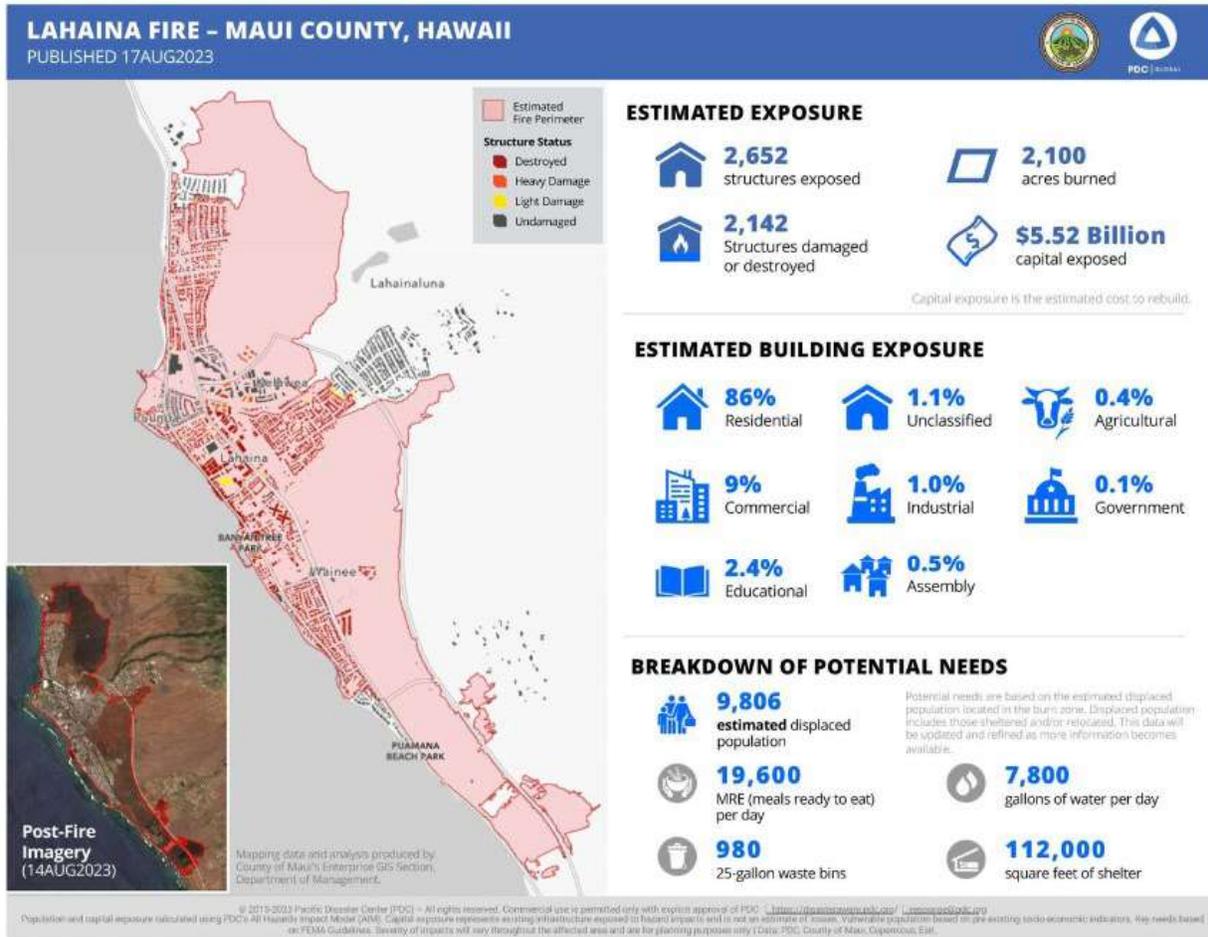
On August 10, 2023, FEMA issued a Major Disaster Declaration authorizing Individual Assistance (IA) for the State of Hawaii. The Hawaii wildfires have destroyed homes, land and communities throughout the island of Maui and have resulted in health and economic impacts throughout Maui County. The west Maui community of Lahaina, population 12,000 and once Hawaii's capital sustained the most fire damage.

The response and recovery efforts continue to be significantly challenged due to the high level of fatalities caused by this disaster. The loss of life in this disaster is greater than any fire event in more than a century; standing at more than 115 lives confirmed lost as of August 29, 2023. The ongoing search for remains is a priority over debris removal and recovery. As of August 28, 2023, the Federal Bureau of Investigation reports that there are 388 credible reports of missing persons that have yet to be resolved. The overall recovery will be measurably delayed by the need to find, identify, and reunite the departed with their loved ones and next of kin.

The Maui fire now ranks among the top 10 deadliest U.S. wildfires on record since 1871, according to the National Fire Protection Association (NFPA) and is the largest natural disaster in Hawaii's history.

- Lahaina Harbor destroyed
- Over 2,142 structures damaged
- 9,806 estimated displaced population
- 7,800 gallons of water is needed per day
- There are currently 1,031 households without power

- There are 3 active brushfires still ongoing.
 - Olinda fire with an estimated 1,081 acres destroyed
 - Kula Fire with an estimated 202 acres destroyed
 - Lahaina Fire with an estimated 2,170 acres destroyed
- Data from the Pacific Disaster Center (PDC) and FEMA showed that more than \$5.5 billion in capital was exposed to flames in and around Lahaina, and \$400 million in property was impacted in Kula as of 8/17/2023.



Housing Impacts and Challenges

FEMA registration data show survivors have a clear need for housing. As of August 29, 2023, 1,436 owners and 3,906 renters self-reported to FEMA that their damaged dwelling was destroyed. 1,290 owners and 778 renters also self-reported major damage. Of the 2,799 applicants with completed inspections, 127 owners and 2,672 renters were determined to be destroyed.

Limited Rental Inventory

The supply of available market-rate units in Hawaii was in short supply prior to the disaster and has significantly decreased following the disaster. These impacts have created a substantial demand for housing in a county where there was an existing housing crisis due to low inventory of rentals and affordable housing. The Hawaii Fire Relief Housing Program has been actively supporting the county to promote available rentals and created a consolidated website for survivors. As of August 29, 2023, there are 625 properties are listed on the website most of

which are further than the average commuting distance from the area of highest damage concentration.

Availability of Affordable Housing

The lack of available rental housing in the affected area, and in the County of Maui in general, poses a significant challenge for disaster survivors to recover; the lack of affordable housing is a critical issue for the impacted population. Many survivors are longtime Maui residents; their recovery is complicated by the higher cost of housing in other parts of the county. Public Housing is also at capacity.

Direct Housing Eligible <i>Data from FEMA 8/29</i>			Rental Resources Available up to 125% FMR <i>Data from Zillow 8/29</i>					Additional Rental Resources <i>Data from Hawaii Fire Relief Website 8/29</i>				
Owners	Renters	Total	1 BR	2 BR	3 BR	4 BR	Total	1 BR	2 BR	3 BR	4 BR	Total
87	1,473	1,560	4	6	3	2	15	61	29	12	1	103

Due to all the challenges listed above, Rental Assistance will not sufficiently meet the housing needs of all eligible survivors, even with the previously approved Rental Assistance rate increase to 125% of the U.S. Department of Housing and Urban Development Fair Market Rent. Additionally, other Federal, State, Local, and voluntary organization programs remain insufficient to meet the disaster-caused needs. **Direct Housing Assistance is needed to ensure the survivors recover in a timely manner and preserve the integrity of the impacted communities. Therefore, I am requesting Direct Housing Assistance to assist disaster survivors in Maui County.**

Maui County and the State of Hawaii continue to evaluate all potentially viable options to address the housing challenges in coordination with the Sheltering and Housing Task Force. The unique housing challenges for this disaster will require innovative direct housing solution(s); these challenges include the loss of buildable land, the cost and logistics of deploying resources to an island, and building code requirements. Placement of these solutions must consider the impacts to existing utility infrastructure and the need to reconfigure that infrastructure which may further delay repairs and rebuilding.

Maui County and the State of Hawaii are jointly submitting this request to FEMA, emphasizing the importance for response through a comprehensive range of strategies. Our intention is to address the critical housing needs following recent events. To ensure the effectiveness of the proposed solutions, we kindly urge FEMA's thorough assessment include but not be limited to the following options:

1. Direct Leasing and Multifamily Facility Repairs: We advocate for the exploration of direct leasing and repairs to multifamily facilities as immediate housing solutions.
2. We propose the deployment and utilization of FEMA alternative housing units as deemed appropriate, available, and feasible.
3. Due to the housing shortage and unique challenge of building housing OCONUS we request that FEMA discuss with Maui and the State all options available under FEMA's Permanent Construction authority.

In alignment with our commitment to cultural, social, and environmental sustainability, we request the prioritization of housing solutions that adhere to the following priorities:

1. Long-Term Suitability: Housing options should be well-suited for extended use, accommodating the unique composition of households and the everyday lifestyle in Maui for a period of at least 18 months.
2. Residual Community Value: In consideration of prudent financial management, preference should be given to housing options that leave a lasting positive impact on the community, even beyond use in the immediate crisis.
3. Reasonable Commute Time: It is vital that the selected housing solutions maintain an acceptable commute time for Maui residents to access essential services, such as schools, workplaces, transportation, food, medical facilities, places of worship, postal services, daycare, and laundry. We propose that this commute time does not exceed a 20 percent increase from the pre-disaster average commute. Given that the average commute was 21 minutes before the disaster, an acceptable threshold would be 25.2 minutes.
4. Continued Engagement: We acknowledge that some FEMA survivors may opt for immediate housing solutions that do not precisely align with the prioritization set forth by Maui and the State. We request that FEMA continues its commendable efforts to assist eligible individuals and families beyond initial placement. We propose that this assistance persist until the housing options meet the criteria specified by Maui and the State or until survivors secure permanent housing solutions that eliminate the need for future relocations and reliance on disaster funds for sustainability. Our ultimate objective is to provide survivors with the best long-term recovery by not forcing a choice between the known and unknown; or forcing the choice between immediate improvements to their housing situation versus solutions that truly optimize their long-term recovery.

We appreciate FEMA's collaboration in this endeavor and look forward to a housing program that not only meets the immediate needs but also fosters enduring resilience within our community. Thank you for your consideration of this request.

Should you have any questions, please contact Darrick Ching, DR-4724 Joint Housing Task Force, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES DS. BARROS

Governor's Authorized Representative
Hawaii Emergency Management Agency

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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STATE OF HAWAII
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OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

August 31, 2023

Robert Fenton
Regional Administrator FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Request for Section 425 Transportation Assistance
Wildfires, FEMA-4724-DR-HI

Dear Mr. Fenton:

The State of Hawai'i requests FEMA implement Transportation Assistance under Section 425 of the Stafford Act for eligible survivors displaced from their pre-disaster primary residence as a result of DR-4724-HI and in need of travel to alternate locations for short- or long-term accommodations. The request is for the following areas: states of Hawai'i, California, Oregon, Washington, Nevada, Arizona, Utah, and Idaho.

I am providing the following justification for this request:

- **Extended Displacement:** The wildfires swept through city of Lahaina, destroying residences and businesses. FEMA as already received over 16,000 registrations for individual assistance with over 15,000 verified. Rebuilding residences will take several years.
- **Limited Temporary Housing:** Maui's rental market is very limited. According to an article in The Maui News dated 07.01.23, "Maui County leads the state with the highest median asking rent, highest median condominium price, and the most "severely rent burdened" in the state with renters paying more than 50 percent of their income toward rent." The median asking rent, based on advertisements on Craigslist, is \$2,500. The median (paying) rent is \$1,667, the second highest in the state.
- **Limited Infrastructure:** A concurrent lack of infrastructure is contributing to the county's limited housing.

• **Additional Information:** According to the University of Hawai'i Economic Research Organization's "The Hawai'i Housing Factbook", Hawai'i is the most expensive state in the nation for housing. Therefore, the entire state of Hawai'i and several west coast states have been identified as recommended relocation destinations as many residents have extended family in those states. Additionally, these states have established communities of Hawai'i residents who have relocated.

The recommended time perimeter is 18 months for this program, with a 60-day period between inbound and outbound flights. Prior to the flight being approved, the requestor will need to confirm lodging at the destination.

If you have any questions or require additional information, please contact contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or 008-620-5410.

Sincerely,



JAMES D.S. BARROS
Administrator of Emergency Management

Attachment: "Maui County has highest share of 'severely rent burdend' households, The Maui News, July 1, 2023.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

September 6, 2023

Mr. Timothy Manner
Federal Coordinating Officer
Federal Emergency Management Agency
c/o Hawai'i Emergency Management Agency
4204 Diamond Head Road
Honolulu, HI 96816

Dear Mr. Manner:

Extension Request for Critical Needs Assistance (CNA)
Wildfires, FEMA-DR-4724-HI

The State of Hawaii requests that FEMA extend Critical Needs Assistance (CNA) for an additional 30 days for eligible applicants in the County of Maui, who are displaced from their primary dwelling and have immediate or critical needs in order to obtain life-saving and life-sustaining supplies or need assistance in order to leave their pre-disaster primary residence to temporarily shelter elsewhere.

Due to multiple devastating wildfires, the residents of several Maui communities were forced to evacuate. Most notably, the residents of Lahaina lost their homes on the evening of August 8, 2023. Lahaina is reporting more than 2,500 destroyed structures and a population of 12,702. Presently there are over 5,860 people in 30 non-congregate shelters.

We recognize that this assistance is provided under the Other Needs Assistance (ONA) provision of the Individuals and Households Program (IHP) and is subject to a 25% state cost share.

We request that FEMA waive certain criteria outlined in Individual Assistance Program and Policy Guide (IAPPG) 1.1, Chapter 3, Section VI.B.6., to align with other authorizations of CNA in recent disasters. For this disaster, we request that applicants not be required to report damage that impacts the habitability of their home. Additionally, we request that applicants may be displaced from their pre-disaster primary residence or assert a critical need at registration in order to qualify for CNA, rather than meeting both requirements.

Lastly, for DR-4724-HI, we request a policy waiver to increase the CNA award amount to \$700.00, to be provided as a one-time award per eligible household.

We are requesting a 30 day extension of the eligibility period for CNA. We understand that FEMA may only provide CNA during the 60-day registration period and any approved registration period extensions. We also understand that a request to extend the eligibility period must be based on applicant need, approved by the Individual Assistance Division Director, and may only be made under the following circumstances and will be justified with an additional written request, if warranted.

- Disaster survivors will not be able to register within the initial eligibility period; or
- Extending the CNA eligibility period will be in the best interest of the public due to extraordinary circumstances, such as significant obstacles delaying applicant registration.

We understand that FEMA may only provide CNA during the 60-day registration period and any approved registration period extensions.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative
State of Hawai'i

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

September 12, 2023

Robert Fenton
Regional Administrator FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Request for Clean and Sanitize Assistance
Wildfires, FEMA-4724-DR-HI

Dear Mr. Fenton:

The State of Hawai'i requests FEMA implement Clean and Sanitize Assistance for DR-4724-HI.

The State of Hawai'i recognizes that Clean and Sanitize Assistance is provided under the Other Needs Assistance provision of the Individuals and Households Program and is subject to a 25% state cost share. We also understand and acknowledge the following:

- Clean and Sanitize Assistance is limited to a fixed amount of \$300 per household; and
- Clean and Sanitize Assistance will be awarded as a one-time payment.

If you have any questions or require additional information, please contact contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or 008-620-5410.

Sincerely,

JAMES DS. BARROS
Administrator of Emergency Management



FEMA

September 13, 2023

MEMORANDUM FOR: Timothy B. Manner
Federal Coordinating Officer
FEMA-4724-DR-HI

THROUGH Robert J. Fenton
Regional Administrator
FEMA Region 9

FROM: William C. Hagmaier
Acting Assistant Administrator
Recovery Directorate

SUBJECT: Direct Housing Approval for FEMA-4724-DR-HI

**WILLIAM C
HAGMAIER** Digitally signed by
WILLIAM C HAGMAIER
Date: 2023.09.13
20:06:35 -04'00'

The purpose of this memorandum is to respond to your recommendation to approve the State of Hawaii's request, dated August 30, 2023, for Direct Housing Assistance for FEMA-4724-DR-HI.

As you note in your recommendation, the Housing Assistance provision of the Individuals and Households Program (IHP), authorized by Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, or "Stafford Act," as implemented in 44 C.F.R. Part 206.117 authorizes FEMA to provide Direct Assistance for temporary housing when eligible applicants are unable to obtain temporary housing with financial assistance due to a lack of available housing resources. FEMA determines the appropriate types of assistance based on considerations of cost-effectiveness, convenience to disaster survivors, and the suitability and availability of the types of assistance to meet the post-disaster housing needs. Direct Housing Assistance may be provided for periods of up to 18 months from August 10, 2023, the date of the President's declaration of a Major Disaster, to February 10, 2025.

The Hawaii wildfires have destroyed homes, land, and communities throughout the island of Maui and have resulted in health and economic impacts throughout Maui County. The west Maui community of Lahaina, population 12,000 and once Hawaii's capital sustained the most fire damage.

FEMA registration data show survivors have a clear need for housing. As of September 6, 2023, 4,208 renters and 1,545 owners have reported to FEMA that their damaged dwelling was destroyed. Of the 5,753 applicants that reported a destroyed damaged dwelling, 2,734 were inspected. 2,471 of the 2,734 were confirmed destroyed and 1,953 were referred for housing assistance. Of the 1,953 referred, 1,889 households meet the Direct Housing eligibility criteria.

Upon review of the information gathered from an initial assessment, the number of eligible applicants projected to have a temporary housing need exceeds the number of available housing

resources within Maui County. Many survivors are longtime Maui residents; their recovery is complicated by the higher cost of housing in other parts of the county. Public Housing is also at capacity.

Maui County and the State of Hawaii continue to evaluate all potentially viable options to address the housing challenges in coordination with the Sheltering and Housing Task Force. The unique housing challenges for this disaster, including the loss of buildable land, the cost and logistics of deploying resources to an island, and building and code requirements, will require innovative direct housing solution(s).

Based on the justification provided by the State of Hawaii, I approve your request for direct housing assistance in the forms of Multifamily Lease and Repair and Direct Lease for Maui County. The Individual Assistance Program and Policy Guide (IAPPG) identifies multi-family rental housing as a rental property that contains three or more dwelling units. Due to the significant housing limitations in Maui, I am approving a waiver to this policy to allow FEMA to identify and repair eligible multifamily housing units consisting of two or more dwelling units to increase the number of potential resources.

The use of Alternative Transportable Temporary Housing Units (ATTHUs) may also be necessary to meet the needs of displaced families. I am temporarily holding approval of the use of ATTHUs in abeyance to allow additional research into the suitability, availability, and timeliness of ATTHU options in Hawaii. I will immediately consider approval of ATTHUs once additional information is available and a viable strategy is identified.

If you need any additional assistance from the Recovery Directorate or other Headquarters components in the exploration and development of all available options, or if you have any questions regarding this approval, please contact Dr. Elizabeth Asche, Acting Director, Individual Assistance Division at Elizabeth.Asche@fema.dhs.gov.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

September 23, 2023

Mr. Robert Fenton
Regional Administrator, FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Request to Extend the FEMA Individual Assistance Deadline
Wildfires, FEMA-4724-DR-HI

Dear Mr. Fenton:

The State of Hawai'i requests that the Federal Emergency Management Agency (FEMA) extend the registration period for eligible survivors in the County of Maui to November 9, 2023, an extension of 30 days. This extension is necessary to assist disaster survivors who have not yet registered for individual assistance (IA). The current registration period ends October 10, 2023.

Three Disaster Recovery Centers (DRC) are currently open. As of date, 17,376 individuals have registered for FEMA IA with 16,126 validated. Over the past 7 days, FEMA registrations have increased an average of 64 per day and the DRCs have had over 400 visitors per day.

Additional registrations are expected as community groups organize activities to bring non-English speaking survivors to the DRCs. The Safe Harbor period ends September 29, 2023 so many survivors are submitting late registrations to obtain non-congregate shelter.

If you have any questions or require additional information, please contact contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or 808-620-5410.

Sincerely,

JAMES DS. BARROS
Governor's Authorized Representative



FEMA

September 25, 2023

MEMORANDUM FOR: Timothy Manner
Federal Coordinating Officer
FEMA-4724-DR-HI

ATTENTION: Robert J. Fenton
Regional Administrator
FEMA Region 9

FROM: Elizabeth Asche
Director (Acting)
Individual Assistance Division

ELIZABETH Digitally signed by
A ASCHE ELIZABETH A ASCHE
Date: 2023.09.25
16:36:09 -04'00'

SUBJECT: Critical Needs Assistance and Individual Assistance Program and
Policy Guide, Version 1.1 Policy Waiver Extension Approval for
FEMA-4724-DR-HI

This memorandum is in response to the State of Hawaii's request, dated September 6, 2023, and the Region's recommendation for FEMA to approve a 30-day extension to the eligibility period for Critical Needs Assistance (CNA) under the Individuals and Households Program (IHP) for FEMA-4724-DR-HI. FEMA Region 9 recommended approving the request, but limiting the extension to applicants whose pre-disaster household was located in ZIP codes 96761 and 96767, the IA-designated ZIP codes directly impacted by the wildfires. On August 11, 2023, FEMA authorized CNA for a 30-day period for eligible applicants in Maui County. The authorization also approved an increase to the CNA award amount to \$700. Section 408(e)(2) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act and 44 C.F.R. 206.119(c)(6)(ii) authorize FEMA to provide assistance for necessary expenses or serious needs resulting from a major disaster.

FEMA may provide financial assistance under the Other Needs Assistance provision of the IHP to applicants who have immediate or critical needs because they are displaced from their primary residence or who need assistance in order to leave their pre-disaster primary residence to temporarily shelter elsewhere. Immediate or critical needs are life-saving and life-sustaining items including, but not limited to: water, food, first aid, prescriptions, infant formula, diapers, consumable medical supplies, durable medical equipment, personal hygiene items, and fuel for transportation.

Pursuant to FP 104-009-03, *Individual Assistance Program and Policy Guide, Version 1.1, Chapter 3, Section VI.B.6*. (IAPPG 1.1), the Individual Assistance (IA) Division Director may extend the CNA eligibility period, if requested by the affected state, tribal, or territorial government, when necessary based on applicant need.

The State of Hawaii provided the following justification to approve a 30-day extension to the CNA eligibility period. As of September 6, 2023, the American Red Cross reported over 5,860 individuals currently located in 30 non-congregate shelters (NCS) with an additional 26 households currently occupying Transitional Sheltering Assistance hotel rooms. The Joint Field Office conducted an analysis that indicated that roughly 50% of households in NCS are registered for FEMA assistance, and Disaster Survivor Assistance teams are regularly supporting these shelters to provide registration intake or case review. Additionally, infrastructure and public utilities serving residences within the zip codes directly impacted by the wildfires continue to be severely impacted without an estimated restoration date, creating barriers to survivor registration. Because of these aforementioned reasons, the State of Hawaii requests and the Region recommends that a 30-day extension be approved to align CNA with the registration period so that all applicants who register for assistance may be considered for CNA.

Based on the information provided by the State of Hawaii, I am extending the CNA eligibility period to October 10, 2023.

Per the IAPPG 1.1, previously approved waivers, and this memorandum, applicants will be considered for CNA if the following apply:

- Their pre-disaster primary residence is one of the ZIP codes designated for IA and directly impacted by the wildfires, which are 96761 and 96767;
- They pass FEMA's identity and occupancy verification process;
- They are displaced from their pre-disaster residence as a result of the disaster based on their current location recorded in the National Emergency Management Information System, or they assert at registration that they have critical needs and request financial assistance for those needs and expenses; and
- All high-risk fraud indicators associated with their registration are resolved.

CNA will continue to be provided as a one-time, \$700 award per eligible household. Applicants who apply during the eligibility period and resolve all issues impacting eligibility prior to the end of the registration period and any approved extensions may receive CNA. Applicants who resolve ineligibility issues after the close of the registration period will not receive CNA. In response to receiving a large volume of registrations with high-risk fraud indicators, FEMA began providing CNA post-inspection for all eligible applicants referred for an inspection beginning on September 7, 2023. Eligible applicants who register by October 10, 2023 and do not require an inspection will continue to receive CNA without an inspection. All other criteria outlined in the IAPPG 1.1 and the August 22, 2023, memorandum authorizing CNA and related IAPPG 1.1 waivers for FEMA-4724-DR-HI remain in effect.

If you have any questions or need any additional information, please contact Blair McDonald, Acting Branch Chief, Individuals and Households Program Service Delivery Branch.

cc: Jesus Ceja, Individual Assistance Branch Director, FEMA-4724-DR-HI
Colt Hagmaier, Assistant Administrator (Acting), Recovery Directorate
Monty LeMaire, Deputy Director (Acting), Individual Assistance Division
Blair McDonald, Branch Chief (Acting), Individuals and Households Program Service Delivery Branch, Individual Assistance Division



FEMA

September 27, 2023

James DS. Barros, Administrator
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

RE: Clean and Sanitize Assistance Request, FEMA-4724-DR-HI

Dear Administrator Barros,

On September 12, 2023, the State of Hawaii requested that FEMA implement Clean and Sanitize Assistance (CSA) for qualifying Individual Assistance applicants who were affected by FEMA-4724-DR-HI. Based on the authorities delegated to me, I approve your request.

Section 408(e)(2) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act implemented at 44 C.F.R. § 206.119(c)(6)(ii) authorizes FEMA to provide assistance for other miscellaneous items or services that FEMA, in consultation with the State, determines are necessary expenses or serious needs resulting from a disaster. Under this authority, FEMA may provide a limited amount of financial assistance to applicants with disaster-caused real property who do not qualify for Housing Assistance because the damage did not render their home uninhabitable.

As noted in your request, in addition to meeting general conditions of eligibility (see Individual Assistance Program and Policy Guide (IAPPG), Chapter 3, Section II, as amended by the enclosed memo dated September 2, 2021), applicants must meet the following conditions to receive CSA:

1. The pre-disaster primary residence is in an area designated for Individual Assistance.
2. Based on a FEMA inspection, the applicant has disaster damage recorded or, for renters, noted clean-up actions are needed or have been taken.
3. The damage is not covered by the applicant's insurance.
4. FEMA determines the applicant's disaster-damaged primary residence is safe to occupy.

As you also noted, CSA is limited to \$300 per eligible household and will be awarded a one-time payment and is subject to a 25% state cost share.

COL (Ret.) James DS. Barros, Administrator
Clean and Sanitize Assistance Approval
FEMA-4724-DR-HI
Page 2 of 2

If you have any questions or need any additional information, please contact FCO Timothy Manner at (202) 531-9544.

Sincerely,

A handwritten signature in black ink, appearing to read 'RJF', written in a cursive style.

Robert J. Fenton
Regional Administrator
FEMA Region 9

cc: Timothy B. Manner, Federal Coordinating Officer, DR-4724-HI
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency



FEMA

October 2, 2023

James DS. Barros, Administrator
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: IA Registration Extension Request FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is in response to the State of Hawaii's September 23, 2023 request for the Federal Emergency Management Agency (FEMA) to extend the Individual Assistance (IA) registration deadline for an additional 30 days in Maui County for FEMA-4724-DR-HI. Based on the information provided by the State and an analysis of the IA registration trends by the Joint Field Office (JFO), I am approving the State's registration period extension request and allowing for a 30-day extension. The original registration period was set to end on October 10, 2023. With the approval of this request, the registration period for Individual Assistance will now end at close of business on Thursday, November 9, 2023.

Pursuant to 44 C.F.R. § 206.112(b) and the Individual Assistance Program and Policy Guide, FP 104-009-03, at 70-71 (May 2021) (IAPPG), in limited circumstances, the Regional Administrator may extend the initial registration period for up to 60 days when needed and justified. FEMA evaluates the need for a registration period extension by considering the below factors:

- When it is necessary to establish the same registration deadline for subsequently designated contiguous areas;
- When there is a continued high volume of registration; and/or
- When there are significant barriers to registration.

Background

The State is requesting an extension of the IA deadline to ensure that all eligible households have an equitable opportunity to apply for federal assistance and receive IA benefits. The State expects that additional registrations will come in as community groups organize activities for survivors, particularly those with language barriers.

An analysis by the IA Branch at the JFO demonstrates that extending the registration period is warranted. FEMA staff continue registration outreach efforts, both at Disaster Recovery Centers (DRCs) and at shelter hotels. Currently, three DRCs are open in Maui and foot traffic continues to remain steady. Within the last five days, from September 20 through September 24, 2023, the

average number of visitors was 898 and the average number of first-time visitors was 757. Additionally, the daily registration numbers remain high. Within the past 14 days, from September 11 through 24, 2023, total daily registrations have averaged 86 households per day.

Allowing a 30-day extension to the registration period ensures that all vulnerable populations have an opportunity to register. Moreover, this will allow JFO External Affairs and the State's Public Information Officer to continue to message the need to register for FEMA assistance.

Please note, in accordance with the IAPPG, after the end of the registration period FEMA may accept late applications for an additional 60 days. However, in order for FEMA to process late applications, the applicant must submit a letter to FEMA that explains the extenuating circumstances that prevented them from applying for assistance in a timely manner, signed by the applicant or person who the applicant authorizes to act on their behalf. The letter should also include documentation justifying the extenuating circumstances. The documentation provided must be dated immediately prior to or within the FEMA registration period. Acceptable documentation may include:

- Record of hospitalization, illness, or disability of the applicant or an immediate family member;
- Record of death for an immediate family member; or
- Proof of personal or business travel that kept the applicant out of the area for the full application period.

FEMA will not allow applications after the 60-day grace period. If you or your staff have questions, please do not hesitate to contact Timothy B. Manner, FCO FEMA-4724-DR-HI, at (202) 531-9544.

Sincerely,



Robert J. Fenton
Regional Administrator
FEMA Region 9

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9

Attachment: State of Hawaii Registration Deadline Extension Request Letter dated September 23, 2023



FEMA

October 11, 2023

MEMORANDUM FOR: Robert J. Fenton
Regional Administrator
FEMA Region 9

ATTENTION: Timothy B. Manner
Federal Coordinating Officer
FEMA-DR-4724-HI

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

**WILLIAM C
HAGMAIER** Digitally signed by
WILLIAM C HAGMAIER
Date: 2023.10.11
21:15:09 -04'00'

SUBJECT: Section 425 Transportation Assistance for FEMA-DR-4724-HI

The purpose of this memorandum is to approve implementation of Transportation Assistance for air travel for individuals and households affected by wildfires, FEMA-DR-4724-HI.

Background

Section 425 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended (42 U.S.C. § 5189c), authorizes FEMA to provide transportation assistance to relocate individuals displaced from their pre-disaster primary residences as a result of a major disaster or emergency or otherwise transported from their pre-disaster primary residence under Section 403(a)(3), 42 U.S.C. § 5170b(a)(3), or Section 502, 42 U.S.C. § 5192, of the Stafford Act, to and from alternative locations for short or long-term accommodations; or to return an individual or household to their pre-disaster primary residence or alternative location.

The State of Hawaii submitted a written request to FEMA on September 12, 2023, requesting implementation of Section 425 Transportation Assistance for FEMA-DR-4724-HI. Due to the devastating impacts of the wildfires, applicants are displaced from their damaged homes and may not be able to begin rebuilding in some areas for at least six months. Additionally, there are insufficient rental resources on the island of Maui to house the displaced individuals. Although these conditions exist in many disasters, the geographic distance between Hawaii and the continental United States and the cost of air travel is prohibitive for applicants attempting to utilize Rental Assistance to secure temporary housing outside of the impacted area. Without implementing Transportation Assistance, these extraordinary circumstances represent a significant limitation to the State of Hawaii achieving its temporary housing strategy. Section 425 Transportation Assistance is approved with the following conditions:

Conditions of Eligibility

Transportation Assistance is a separate authority under the Stafford Act and is not a part of an applicant's maximum amount of financial assistance under Section 408 of the Stafford Act for the Individuals and Households Program (IHP).

In order to be considered for Section 425 Transportation Assistance:

- The applicant must register for FEMA assistance within the registration period;
- The applicant's pre-disaster primary residence must be in an area declared for Individual Assistance;
- The applicant must be displaced from their pre-disaster primary residence due to the disaster;
- The applicant must be able to secure temporary housing (excluding hotels/motels) in the alternative location;
- The applicant must pass identity verification;
- The applicant must pass citizenship requirements;
- The applicant must not have assistance available for transportation expenses from any other source;
- The applicant meets the direct housing thresholds as outlined in the Individual Assistance Program and Policy Guide, Version 1.1;
 - For renters, the applicants' pre-disaster primary residence must have been recorded by FEMA inspection as major or destroyed categories in real property damage due to the disaster.
 - For owners, the applicants' pre-disaster primary residence must have sustained more than \$12 sq. ft. in real property damage due to the disaster, as determined by FEMA inspection.
- The applicant received Rental Assistance but is unable to identify a rental resource on Maui; and
- All household members, as defined in 44 C.F.R. 206.111, must utilize Transportation Assistance and be listed on the FEMA application. Applicants may call FEMA to add pre-disaster household members to the application if they were not listed at the time of registration.

Eligible Expenses

Eligible expenses may include tickets and associated expenses for:

- Domestic airfare, via commercial flight, at the equivalent of economy/coach class; however, FEMA may approve increased airfare costs for seat upgrades, when necessary, to accommodate household member(s) with an access or functional need:
 - Individuals and households traveling from Hawaii are eligible for one round trip for all household members, household pets, and service animals to any U.S governed location.
 - Individuals and households who have already evacuated, whether by assistance from FEMA or of their own accord, may be eligible for a one-way return trip to Hawaii for all household members, household pets, and service animals.
- Passenger baggage fees up to \$100 per household member.

- Cost to transport pets with the household are limited to household pets and service animals that may be transported via a commercial airline. For example, most airlines only allow cats and dogs to travel, and there are specific animal breed and size requirements and restrictions. Pet travel needs must be pre-identified by the applicant with the contractor prior to booking airfare. Interstate requirements pertaining to inbound animal clearances will be the responsibility of the passengers, and FEMA will not cover expenses for special pet crates.
- Service animals and reasonable accommodations must be identified prior to booking airfare.

Applicant Approval, Funding, and Data Transfer

- No payments will be made directly to applicants.
- Transportation Assistance will be paid under a centrally billed account.
- FEMA will provide updated lists of approved applicants to the contractor daily.
- The contractor will only book travel for approved applicants, their pre-disaster household members, and pre-identified household pets and service animals.
- The contractor will provide a list of confirmed reservations to FEMA daily.

Limitations and Exclusions

- Travel for unaccompanied minors is not an eligible expense.
- Meals, ground transportation, and additional costs for the applicant, household, or household pets and service animals beyond the cost of the flight are not eligible costs under Transportation Assistance.
- Travelers must have a government photo ID in order to clear Transportation Security Administration airline security. The household is responsible for establishing and maintaining required travel documents.
- Transportation Assistance is limited to travel arranged under this policy; applicants are not eligible for reimbursement of expenses for travel that has already occurred or is booked outside of this program. Applicants may only update or change their flight arrangements through the contractor.
- All Transportation Assistance must be completed within the IHP period of assistance for FEMA-DR-4724-HI, i.e., 18 months from the date of declaration, with at least 90 days between inbound and outbound flights. Applicants, upon return, may utilize FEMA-provided Direct Temporary Housing Assistance, if needed.

If you have any questions regarding this approval, please contact Dr. Elizabeth Asche, Acting Director, Individual Assistance Division at Elizabeth.Asche@fema.dhs.gov.

cc: Heather R. Smith, Recovery Division Director (Acting), Region 9
 Jesus Ceja, Individual Assistance Branch Chief, Region 9
 Monty LeMaire, Deputy Director (Acting), Individual Assistance Division
 Blair McDonald, Branch Chief (Acting), Individuals and Households Program Service Delivery Branch, Individual Assistance Division

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

November 2, 2023

Mr. Robert J. Dargan
Federal Coordinating Officer
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Request to Extend the FEMA Individual Assistance Deadline
Wildfires, FEMA-4724-DR-HI

Dear Mr. Dargan:

The State of Hawai'i requests that the Federal Emergency Management Agency (FEMA) extend the registration period for eligible survivors in the County of Maui to December 21, 2023, an extension of 30 days. This extension is necessary to assist disaster survivors who have not yet registered for individual assistance (IA). The current registration period ends November 9, 2023.

One Disaster Recovery Center (DRC) recently closed with two still open. As of November 1st, 18,445 were registered in FEMA IA with 17,178 validated, an average of 17 new registrations per day. The DRCs had an average of 136 new visitors and 326 returning visitors per day.

Survivors require extra support because of transportation challenges to get to a DRC to ask questions, unfamiliarity with the system/process as well as receiving consolidated information among the many partners assisting survivors, and language barriers. Survivor applicants are returning in high numbers to check on their registration. FEMA is more efficient to support the survivors who are returning to the DRC daily (because of PII issues) to resolve registration issues and continue to move them through the system.

If you have any questions or require additional information, please contact contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or 808-620-5410.

Sincerely,

JAMES DS. BARROS
Governor's Authorized Representative



FEMA

November 8, 2023

James DS. Barros
Governor's Authorized Representative
4204 Diamond Head Road
Honolulu, HI 96816

Re: Request to Extend the FEMA Individual Assistance Deadline
FEMA-4724-DR-HI

Director Barros,

This correspondence is in response to your letter dated November 2, 2023, formally requesting an extension of the Individual Assistance registration period under FEMA-4724-DR-HI for an additional 30 days. The deadline to register for FEMA assistance is currently November 9, 2023.

Pursuant to 44 C.F.R. § 206.112(b) and the *Individual Assistance Program and Policy Guide (IAPPG)*, FP 104-009-03, at 70-71 (May 2021), I am exercising my authority to approve the State's extension request. The registration period will now end on December 9, 2023.

If you or your staff have questions, please do not hesitate to contact Thomas J. Dargan, Federal Coordinating Officer, at 330-980-6646 or thomas.dargan@fema.dhs.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Fenton".

Robert J. Fenton
Regional Administrator
FEMA Region 9

cc: Lorinda Wong-Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Darrick Ching, Hawaii Emergency Management Agency
Heather R. Smith, (Acting) Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9

Attachment: State of Hawaii Registration Deadline Extension Request Letter dated November 2, 2023

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

November 30, 2023

Mr. Robert J. Fenton
Regional Administrator
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Dear Mr. Fenton:

The 2024 Hawai'i Administrative Option Selection Agreement for Individuals and Households Program (IHP) Other Need Assistance is enclosed for your review and action, as appropriate. The submission of the IHP-ONA Administrative Option Selection Form is an essential component of the State of Hawaii's partnership with the Federal Emergency Management Agency (FEMA) for the delivery of assistance under subsection 408 (e) and (f) of the Robert T. Stafford Disaster Relief Emergency Assistance Act 42 U.S.C. §5174 (e) and (f). The State of Hawai'i selects the FEMA Option for management and administration for the "Other Needs" portion of the program. The State also established the following amounts to be paid for Transportation, Funeral, Child Care and Moving & Storage Expenses:

Transportation Repair \$4,500.00
Transportation Replace (Total Loss) \$16,500.00
Funeral Maximum (Unmet Need) \$11,000.00
Child Care Assistance (Maximum): \$2,500.00
Moving and Storage Assistance: \$24,000

The State is also requesting medical, dental, and vision assistance to handle immediate needs.

If you have any questions or require additional information, please contact contact Mr. Donald Aweau, Executive Officer, at donald.s.aweau@hawaii.gov or 808-798-1804.

Sincerely,

JAMES DS. BARROS
Governor's Authorized Representative

DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency

OMB Control No. 1660-0061
Expiration Date: 05/31/2026

**INDIVIDUALS AND HOUSEHOLDS PROGRAM (IHP)
OTHER NEEDS ASSISTANCE ADMINISTRATIVE OPTION SELECTION**

Instructions: This form must be completed and submitted to the Federal Emergency Management Agency (FEMA) by November 30 every year.

PAPERWORK BURDEN DISCLOSURE NOTICE

Public reporting burden for this data collection is estimated to average 1.08 hour per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting this form. This collection of information is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed on this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472-3100, Paperwork Reduction Project (1660-0061). **NOTE: Do not send your completed form to this address.**

PRIVACY ACT STATEMENT

AUTHORITY: FEMA is authorized to collect the information requested on this form pursuant to Section 696 of the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), 6 U.S.C. 795; The Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended, 42 U.S.C. §§ 5121-5207 and Reorganization Plan No. 3 of 1978 (43 FR 41943); 44 C.F.R. § 206.2(a)(27); The Homeland Security Act of 2002, 6 U.S.C. §§ 311-321j; The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193) and Executive Order 12862, Setting Customer Service Standards, dated September 11, 2003 and Executive Order 13411, Improving Assistance for Disaster Victims, dated August 29, 2006. DHS asks for your SSN pursuant to the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3325(d) and § 7701(c)(1). SSNs are included on tax returns pursuant to Internal Revenue Code (various amendments), 26 U.S.C. 6109(d).

PRINCIPAL PURPOSE(S): FEMA collects this information to establish a State, Tribal or Territorial government's level of support and participation in the delivery of federal financial assistance to impacted citizens under a Presidentially-declared disaster. FEMA may also review this information internally for quality assurance control purposes and use it to assess FEMA's customer service to disaster assistance applicants.

ROUTINE USE(S): FEMA may share the information collected on this form externally as permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes sharing this information with State, local, Tribal and voluntary organizations to enable individuals to receive additional disaster assistance and as necessary and authorized by other routine uses published in DHS/FEMA-008 Disaster Recovery Assistance Files System of Records, 87 Fed. Reg. 7,852 (February 10, 2022), and upon written request, by agreement, or as required by law, as well as DHS/FEMA/PIA-057 Individuals and Households Program Equity Analysis (June 30, 2022) which allows collection and analysis of information from FEMA applicants to ensure the equitable and impartial distribution of supplies, processing of applications, and performance of other relief and assistance activities, in accordance with Section 308(a) of the Stafford Act, which prohibits discrimination on grounds of race, color, religion, nationality, sex, age, disability, English proficiency, or economic status

DISCLOSURE: The disclosure of information on this form is voluntary; however, failure to provide the information requested may delay or prevent the individual from receiving disaster assistance. If you have any questions about completing this document, you should call FEMA's Helpline at 1-800-621-FEMA (3362) (hearing/speech impaired only: 1-800-462-7585) as soon as possible.

STATE/INDIAN TRIBAL GOVERNMENT SELECTION AND LINE ITEM MAXIMUM

The State/Indian Tribal Government of Hawai'i selects the following administrative option for the administration of the Other Needs Assistance provision of the Individuals and Households Program:

- FEMA Option:** FEMA Administers & Processes.
- JOINT Option:** State/Indian Tribal Government Administers & FEMA Participates:
 - FEMA Processing System Auto-determination **ON**
 - FEMA Processing System Auto-determination **OFF**
- STATE/INDIAN TRIBAL GOVERNMENT Option:** State/Indian Tribal Government Administers & Processes.

The State/Indian Tribal Government approves the following line item amounts to be awarded for ONA:

Transportation Repair:	\$	0 -	4,500.00	
Transportation Replace (Total loss)	\$		16,500.00	
Funeral Maximum (Unmet Need):	\$		11,000.00	per decedent
Child Care Assistance (Maximum)	\$		2,500.00	per child

The State/Indian Tribal Government approves the additional ONA Personal Property and/or Miscellaneous items.
Attached is the list of additional items, the justification, and situations for use.

This administrative option is agreed upon by:

STATE/INDIAN TRIBAL GOVERNMENT AUTHORIZING SIGNATURE

FEMA AUTHORIZING SIGNATURE



Nov 30, 2023



1/8/2024

Governor/Tribal Chief Executive or Designee

Date

Regional Administrator or Designee

Date

SUMMARY OF THE ADMINISTRATIVE OPTIONS

FEMA OPTION: Under this option, FEMA will be the administrator of Other Needs Assistance. The State/Indian Tribal Government shall coordinate ONA activities with FEMA. FEMA shall be responsible for functional elements 1 through 10.

JOINT OPTION: Under this option, the State/Indian Tribal Government will be the administrator of Other Needs Assistance. FEMA shall participate in providing ONA with the State/Indian Tribal Government. FEMA shall be responsible for functional elements 1,2,3,& 8. The State/ Indian Tribal Government shall be responsible for functional elements 4,5,6,7,9, & 10.

STATE/INDIAN TRIBAL GOVERNMENT OPTION: Under this option, the State/Indian Tribal Government will be the administrator of Other Needs Assistance. The State/Indian Tribal Government shall report ONA activities to FEMA. The State/Indian Tribal Government shall be responsible for functional elements 1 through 10.

DESCRIPTION OF FUNCTIONAL ELEMENTS

This section explains the 10 functional elements that must be addressed to successfully implement the Other Needs Assistance mission.

Functional Element 1: *Registration Intake* is a systematic procedure for accepting applications (*Application/Registration for Disaster Assistance FEMA Form 009-0-1*) from disaster survivors who are in need of Federal disaster assistance. The Procedures must provide for the acceptance of late applications, up to the prescribed time limitation as described in 44 CFR 206.112.

Functional Element 2: *Inspection Services* is a standard procedure for inspecting and verifying individually reported disaster-related damages, which will be used to determine the level of Federal disaster assistance.

Functional Element 3: *Processing System* is a prearranged procedure for making uniformed eligibility determinations, to include methods for determining cost for personal property and tracking eligibility decisions.

Functional Element 4: *Disbursing Awards* is a set procedure for issuing funds to applicants.

Functional Element 5: *Staffing* includes the responsibility for having adequate space and an appropriate number of trained personnel. It also includes the responsibility for having appropriate equipment necessary to process assistance (i.e. computers, phones and facsimile machines).

Functional Element 6: *Recovery of Funds* is an arranged procedure for collecting erroneously awarded funds.

Functional Element 7: *Case Processing* is a standard system to process applications and respond to applicant inquiries.

Functional Element 8: *Mail Processing* is a standard procedure for sending program decisions and receiving incoming mail.

Functional Element 9: *Appeals* is an official protocol for evaluating an applicant request to have a program decision reviewed.

Functional Element 10: *Preparation of Closeout Material* involves the preparation of the narrative and statistical documents that compromise a model closeout package. The duties of this function include ensuring that there are no cases pending and that all funds are reconciled for grants and reimbursement of State/Indian Tribal Government expenses.

Auto-Determination is the process of allowing the NEMIS business rules to routinely process information received from registrations and inspections and make an eligibility determination without manual intervention.

ADDITIONAL ONA ITEMS

If the State/Indian Tribal Government is requesting additional ONA Personal Property, Essential Tools, and/or Miscellaneous items, list the additional items below, provide the justification, and situation for use.

Line Item: rice cooker ONA Category: personal property appliance

Standard Quantity: 1 Maximum Quantity Awarded: _____

Justification/Situations for Use:

FEMA USE ONLY Approved Initial RJF Not Approved Initial _____

Line Item: futon or folding mattress ONA Category: bedroom

Standard Quantity: 1 Maximum Quantity Awarded: _____

Justification/Situations for Use:

FEMA USE ONLY Approved Initial RJF Not Approved Initial _____

Line Item: air fryer/pressure cooker ONA Category: personal property appliance

Standard Quantity: 1 Maximum Quantity Awarded: _____

Justification/Situations for Use:

FEMA USE ONLY Approved Initial RJF Not Approved Initial _____

Line Item: _____ ONA Category: _____

Standard Quantity: _____ Maximum Quantity Awarded: _____

Justification/Situations for Use:

FEMA USE ONLY Approved Initial _____ Not Approved Initial _____

Federal Emergency Management Agency Standard Personal Property Line Items

Calendar Year [Jan 1 – Dec 31], __2024__

<u>Line Item Description</u>	<u>Quantity</u>
Living Room	
Coffee table	1
Lamp (1 floor – 1 table)	2
Upholstered 8' sofa	1
Upholstered chair	1
Bedroom	
18" x 48" Mirror	1
4 Drawer chest	1
4' x 5' Mini-blind set	1
Bed – frame/found/mattress	1
Bedspread	1
Blanket	1
Lamp	1
Nightstand	1
Sheet set	1
Standard pillow	1
Bathroom	
3' x 4' Mini-blind set	1
Panel shower curtain	1
Set of personal brushes/combs/ etc. - \$50 Hygiene Allowance	1
Set of personal hygiene items - \$50 Hygiene Allowance	1
Shower rod	1
Towels - (1) 4-piece towel set	4
Tub mat	1
Trash can	1
Dining Room	
Dining table and chairs (4 persons)	1

<u>Line Item Description</u>	<u>Quantity</u>
Kitchen	
2' x 4' Area rug	1
3' x 4' Mini-blind set	1
Blender	1
Broom	1
Can opener (electric)	1
Coffee maker	1
Cooking utensils (miscellaneous)	1
Dinnerware (service for 8)	1
Dish rack and drainer	1
Dishtowels and pot holders (4 pieces)	1
Fire extinguisher (9 lb)	1
Flatware (service for 8)	1
Fork (meat)	1
Glassware (service for 8)	1
Knife set (7 pieces)	1
Mixer (handheld)	1
Mixing bowl set (4 pieces)	1
Mop and bucket	1
Pots and pans w/lids set (8 pieces)	1
Spatula	1
Spoon (cooking)	1
Toaster (2 slots)	1
Trash can	1
Whisk	1
Essential Tool Line Items	
Computer (Essential)	1
Occupational Tools	1
School Books/Supplies	1
Uniforms	1

STATE/INDIAN TRIBAL GOVERNMENT
ACKNOWLEDGEMENT



Nov 30, 2023

Governor/Tribal Chief Executive or Designee

Date

Federal Emergency Management Agency Standard Personal Property Line Items

Calendar Year [Jan 1 – Dec 31], 2024

Line Item Description	Quantity
Personal Property Line items [Previously Owned]	
Air Conditioner **	1:1 ratio
Appliance Service Call	1
* Carbon Monoxide Detector - Misc/Other line item also	1
* Chainsaw - Misc/Other line item also	1
Child Car Seat **	1:1 ratio
Clothing **	1:1 ratio
* Dehumidifier - Misc/Other line item also	1
Dryer	1
Electric Fan **	1:1 ratio
Freezer	1
* Generator - Misc/Other line item also	1
High Chair **	1:1 ratio
* Humidifier - Misc/Other line item also	1
Infant crib**	1:1 ratio
Infant stroller **	1:1 ratio
Microwave	1
Playpen	1
Radio	1
Range/Oven	1
Refrigerator	1
Space Heater **	1:1 ratio
Telephone	1
Television	1
Toys **	1:1 ratio
Twin Bed **	1:1 ratio
Vacuum	1
Washer	1
* Weather Radio - Misc/Other line item also	1

Line Item Description	Quantity
Personal Property Heat Source Line items [Previously Owned]	
Coal (ton)	Up to 1 ton
Wood (cord)	Up to 1 cord
Kerosene (gallon)	Up to 200 gallons
Oil (gallon)	Up to 200 gallons
Pellets (ton)	Up to 1 ton
Propane (gallon)	Up to 200 gallons
Miscellaneous/Other Line items	
* Carbon Monoxide Detector	1
* Chainsaw	1
* Dehumidifier	1
* Generator	1
* Humidifier	1
Smoke Detector - one per damaged floor	1
* Weather Radio	1
Americans with Disabilities Act Line Items [Previously Owned]	
ADA Accessible Bed	1
ADA Accessible Computer	1
ADA Accessible Raised Toilet Seat	1
ADA Accessible Refrigerator	1
ADA Accessible Washer	1
ADA Flashing Fire Alarm - one per damaged floor and occupied bedroom	1
ADA Shower Chair	1
ADA TTY/TDY Telephone	1
ADA Walker	1
ADA Wheel Chair	1

STATE/INDIAN TRIBAL GOVERNMENT
ACKNOWLEDGEMENT



Governor/Tribal Chief Executive or Designee

Nov 30, 2023

Date

* These items can either be previously owned or purchased post-disaster. Assistance will only be awarded under one category and disaster household members who need or are required to use the item or 1 item per occupied bedroom; a 1:1 ratio.



FEMA

December 22, 2023

James DS. Barros
Governor's Authorized Representative
4204 Diamond Head Road
Honolulu, HI 96816

Re: State of Hawaii's Request to Implement Permanent Housing Construction for
FEMA-4724-DR-HI

Dear Mr. Barros,

This correspondence is in response to your letter dated August 30, 2023, formally requesting Direct Housing in the form of Permanent Housing Construction (PHC) for FEMA-4724-DR-HI. The State of Hawaii initially requested Direct Temporary Housing Assistance in the forms of Multifamily Lease and Repair (MLR), Direct Lease, Alternative Transportable Temporary Housing Units (ATTHUs), and Permanent Housing Construction (PHC). On September 13, 2023, Direct Temporary Housing Assistance was approved for MLR and Direct Lease. Approval of ATTHUs was temporarily held in abeyance to allow additional research into the suitability, availability, and timeliness of ATTHU options in Hawaii. After close coordination with the State of Hawaii and Maui County, conducting additional research into the suitability, availability, and timeliness of ATTHU options and reviewing the current housing situation in Maui County, FEMA approved the State of Hawaii's request to implement ATTHU as a form of Direct Housing on December 9, 2023.

As of December 21, 2023, 1,386 Pre-Placement Interview (PPI) eligible households have confirmed a temporary housing need and are willing to participate in FEMA Direct Housing. According to the PPI data, 1,152 households (83 percent) were pre-disaster renters, while 234 households (18 percent) were pre-disaster homeowners. As PHC is exclusively for pre-disaster owners, considering all of the disqualifying programmatic criteria, Individual Assistance at the JFO estimates that 36 households may qualify for PHC.

The Housing Assistance provision of the Individuals and Households Program (IHP), authorized by Section 408(c)(1)(B) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, or "Stafford Act," as implemented in 44 C.F.R. Part 206.117 authorizes FEMA to provide Direct Assistance for temporary housing when eligible applicants are unable to obtain temporary housing with financial assistance due to a lack of available housing resources. Section 408(c)(4) of the Stafford Act authorizes FEMA to provide financial or direct assistance for PHC in insular areas and other locations in cases in which no alternative housing resources are available, and temporary housing assistance is *unavailable, infeasible, or not cost-effective*. FEMA determines

Mr. James Barros

State of Hawaii's Request to Implement Permanent Housing Construction for

FEMA-4724-DR-HI

Page 2 of 2

the appropriate types of assistance based on considerations of cost effectiveness, convenience to disaster survivors, and the suitability and availability of the types of assistance to meet post-disaster housing needs.

PHC would not be an appropriate form of Direct Housing as alternative housing options in Maui County do exist. The *Individual Assistance Program and Policy Guide (IAPPG)* defines “unavailable” as: “Temporary housing options do not exist for any reasonable cost or in any reasonable time. Rental housing is not available and other forms of temporary housing cannot be constructed and deployed in sufficient numbers.” “Infeasible” means: “Rental Assistance cannot be used because there are no available rental resources, or other forms of Direct Temporary Housing Assistance cannot be utilized because of terrain, distance, physical barriers, or time delays, that with reasonable means, FEMA cannot overcome.” “Not Cost-Effective” means: “The cost of providing another form of direct temporary housing (MLR, TTHUs, and Direct Lease) is higher than providing PHC.”

Direct temporary housing resources within a reasonable commuting distance are, or will be, available in sufficient numbers to meet the needs of those that would potentially qualify for PHC. In addition to the general conditions of eligibility, applicants must meet the following conditions in order to receive PHC:

- Applicants are unable to use Temporary Housing Assistance.
- Applicants are not receiving Continued Temporary Housing Assistance (CTHA) or Direct Temporary Housing Assistance.
- Applicants do not have insurance for repair or replacement.
- Applicants must disclose to FEMA all grants and assistance received, including SBA disaster home loans for real property damages, and return any funds determined to be a duplication of benefits to FEMA prior to construction previously awarded Home Repair Assistance or Home Replacement Assistance.
- Applicants have not accepted a disaster home loan from the SBA.

Of the 234 pre-disaster owners eligible and interested in Direct Housing, 188 have homeowner’s insurance that would disqualify them from participating in PHC. Of the remaining 46 households, two have been approved for SBA loans and eight have received FEMA financial home repair or home replacement funds. This leaves a total of 36 households that could be eligible for PHC.

FEMA is committed to matching available Direct Lease resources to all eligible households to the maximum extent possible. For those that cannot utilize Direct Lease, we continue to explore implementation of ATTHUs on potential group sites in Maui County.

Mr. James Barros

*State of Hawaii's Request to Implement Permanent Housing Construction for
FEMA-4724-DR-HI*

Page 2 of 2

If you or your staff have questions, please do not hesitate to contact Shahdy Monemzadeh, Individual Assistance Branch Director, at shahdy.monemzadeh@fema.dhs.gov or at (202) 230-7389.

Sincerely,



Robert J. Fenton
Regional Administrator
FEMA Region 9

cc: Lorinda Wong-Lau, Resilience Branch Chief, HIEMA
Darrick Ching, HIEMA
Thomas J. Dargan, Federal Coordinating Officer, FEMA-4724-DR-HI
Jesus Ceja, Individual Assistance Branch Chief, Region 9
Shahdy Monemzadeh, Individual Assistance Branch Director, FEMA-4724-DR-HI

Attachment: State of Hawaii Direct Housing Request Letter, dated August 30, 2023

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

December 28, 2023

Thomas J. Dargan
Federal Coordinating Officer, FEMA-4724-DR-HI
Joint Field Office
300 Ala Moana Blvd
Honolulu, Hawaii 96850

**SUBJECT: Request to Place Alternative Transportable Temporary Housing Units (ATTHU)
on Group Sites in the County of Maui – Kaanapali 2020 and Waikapu Country
Town**

Dear Mr. Dargan:

The purpose of this letter is to request the Federal Emergency Management Agency's (FEMA) permission to place Alternative Transportable Temporary Housing Units (ATTHU) on two group sites located at Kaanapali 2020 and Waikapu Country Town.

On August 30, 2023, the State of Hawaii requested FEMA Direct Housing in the forms of Direct Lease, Multi-Family Lease and Repair, ATTHU, and Permanent Housing Construction (PHC). September 13, 2023, FEMA approved Direct Housing in the form of Direct Lease and Multi-Family Lease and Repair. December 9, 2023, FEMA approved Direct Housing in the form of Alternative Transportable Temporary Housing Units (ATTHU).

The supply of available market-rate units in Hawaii was in short supply prior to the disaster and has significantly decreased following the disaster. These impacts have created a substantial demand for housing in a county where there was an existing housing crisis due to low inventory of rentals and affordable housing. Direct Lease may be insufficient to meet the temporary housing needs of all Direct Housing eligible households in a timely manner with the lower than expected landlord participation.

Per the Individual Assistance Program and Policy Guide, Chapter 3, Section 4, FEMA complies with Environmental and Historic Preservation (EHP) laws, regulations, and executive orders (EO) when installing TTHUs. FEMA will not install TTHUs within areas which can result in loss of human life or will have adverse impacts on historic properties or endangered or threatened species or designated critical habitat. "FEMA reviews each potential TTHU site for floodplain management concerns and will not place TTHUs within a one percent annual chance floodplain unless no practical alternative exists."

Thomas J. Dargan
Federal Coordinating Officer, FEMA-4724-DR-HI
Subject: Request to Place ATTHU
December 28, 2023
Page 2 of 2

Maui Mayor Bissen's letter dated December 20, 2023 is attached. ATTHU projects are critical to help survivors settle into temporary housing that is more stable than many current housing options. In reviewing the sites feasibility, the Joint Housing Taskforce considered the availability of utilities and essential services (see powerpoint slides attached). Should group sites be approved for ATTHU, the State of Hawaii and County of Maui will ensure compliance with all applicable Federal, State, and local statutes, regulations, and building codes.

Based on the short supply of available housing in the County of Maui, the State of Hawaii requests FEMA's approval to place ATTHU on two group sites in the County of Maui – Kaanapali 2020 and Waikapu Country Town. Should you have any questions, please contact Mr. Donald Aweau at donald.s.aweau@hawaii.gov or 808-733-4300 (ext. 521).

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative



FEMA

January 8, 2024

James DS Barros
Administrator of Emergency Management
State of Hawaii Department of Defense
Office of the Director of Emergency Management
4204 Diamond Head Road
Honolulu, HI 96816

Re: Individuals and Households Program – Other Needs Assistance (IHP-ONA)
Administrative Option Selection for Calendar Year 2024

Dear Mr. Barros:

This is in response to your November 30, 2023 submission of the State of Hawaii's IHP-ONA Administration Option Selection Package for the effective period of January 1, 2024 through December 31, 2024. This package sets forth the State's organization and procedures for administration of the Other Needs Assistance portion of the Individuals and Households Program and selects the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) Option for the effective period.

The State's package meets and complies with the requirements of Title 44 of the Code of Federal Regulations, Part 206, Subpart E, and FEMA guidelines. I have enclosed a copy of the FEMA approved package for your records.

Should you have any questions, please contact me directly at 510-627-7100, or your staff may contact Jesus Ceja, Individual Assistance Branch Chief, at 202-805-6724.

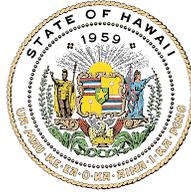
Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Fenton".

Robert J. Fenton
Regional Administrator
FEMA Region 9

Enclosure

cc: Heather Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Donald Aweau, Executive Officer, Hawaii Emergency Management Agency



January 30, 2024

The Honorable Alejandro Mayorkas
Secretary
Department of Homeland Security
Washington, D.C. 20528

Dear Secretary Mayorkas,

As we approach the six-month anniversary of the devastating Maui wildfires, we want to thank you and the entire Biden Administration for all the assistance provided to the people of Maui thus far. We are grateful for your continued partnership.

We write to you today to request that the Federal Emergency Management Agency (FEMA) move forward with site development and construction of a total of 1,000 Alternative Temporary Housing Units (ATHUs) to address the interim housing needs of survivors. We appreciate the 213 units FEMA has approved and believe the remaining units could be accommodated on the sites already under review and design; other sites can be identified if needed.

Prior to the disaster, Maui faced a severe housing shortage. Local families in Lahaina, most of whom are low- to moderate-income, struggled to find market-rate units that were affordable and available. Then the fires came, pushing that shortage to crisis levels. In the aftermath, FEMA approved nearly 4,000 households for rental assistance, but only a small fraction found units on island to lease. Many moved to the mainland. With limited solutions at our disposal, we worked with FEMA to leverage short-term and vacation rentals to transition survivors from hotels and provide stable housing for at least the next year. We are deeply appreciative of the support FEMA will provide through the direct lease program, but we must simultaneously keep an eye on what comes next.

The road to recovery will be far longer than any of us wish. To limit further displacement, we must plan on sustainable housing solutions for survivors until Lahaina is rebuilt. Given the limited supply and development challenges in Maui, a responsible plan must include redundancies and aim to minimize adverse effects on the broader housing market, which unfortunately we understand leasing short-term and vacation rentals may create. The continued participation of short-term and vacation rental owners 12 months from now is also not guaranteed. Moreover, our understanding of needs will continue to shift in the coming months. FEMA has yet to determine whether 1,705 households are eligible for direct housing due to delays determining insurance coverage, and over time, many households will need more help when their insurance coverage for additional living expenses is exhausted. We are united in our belief that the construction of at least 1,000 ATHUs in group sites is necessary, regardless of what additional solutions may present themselves. To be able to respond to needs 12 months

from now, we urge FEMA to complete design and begin site development and the construction for 1,000 ATHUs as soon as possible.

Following his visit to Maui in August, President Biden expressed his commitment “to do everything we can for as long as it takes to help Maui recover and rebuild in a way that respects and honors Hawaiian traditions and cultures and the needs of the local community.” We know this Administration shares in our shared vision to not only build Lahaina back, but do so in a way that is equitable and helps our community become more resilient than before. Thank you again our staff stand at the ready to work in partnership with FEMA to advance the 1,000 ATHUs.

Mahalo,



Brian Schatz
U.S. Senator



Mazie K. Hirono
U.S. Senator



Jill Tokuda
Member of Congress



Ed Case
Member of Congress



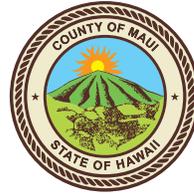
Josh Green, M.D.
Governor, State of Hawaii



Richard Bissen
Mayor, County of Maui

Cc:

The Honorable Deanne Criswell, Administrator, Federal Emergency Management Agency
Robert Fenton, Jr., Region IX Administrator – Federal Emergency Management Agency
The Honorable Marcia Fudge, Secretary, Department of Housing and Urban Development
The Honorable Shalanda Young, Director, Office of Management and Budget



April 1, 2024

The Honorable Deanne Criswell
Administrator, Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, S.W.
Washington, D.C. 20024

SUBJECT: FEMA-4724-DR-HI, Temporary Housing Sites

Aloha Administrator Criswell:

The State of Hawai'i (State) and County of Maui (County) are committed to Maui's recovery following the August wildfires (FEMA-4724-DR-HI). This letter follows up on our request of January 30, 2024, and provides additional information on the availability of sites for temporary housing and our commitment to streamline the construction process.

We appreciate FEMA's efforts to house our people. While their direct lease options for impacted households have been robust, our sheltering needs must also include other housing types to respond to the fragile and dynamic housing and economics of Maui Island. We maintain that the interim housing solution must include a reasonable portion of FEMA-constructed Alternative Temporary Transportable Housing Units (ATTHUs).

We believe 1,000 ATTHUs is an appropriate and reasonable contribution to Maui's recovery. We note that in addition to the roughly 1,300 survivor households approved for direct housing assistance, there are more than 3,000 households according to FEMA's data that have pending applications or have an unstable housing situation that could require additional federal assistance.

While FEMA is responsible for constructing group temporary housing sites, we understand that the State and County play an essential role in identifying appropriate sites. To that end, we present the following locations:

- **Sites undergoing FEMA-led planning and design.**
 - Leiali'i (now known as Kilohana) – While FEMA currently plans to construct 169 units, we know that the overall Leiali'i site could hold more than 600 units;

- Kā'anapali 2020 – 213 units; and
 - Waikapu Country Town – approximately 400 units.
- **State and County-controlled locations that are available for temporary housing sites.** While these sites are not immediately shovel ready, minor site work, infrastructure repair, and temporary infrastructure installation could prepare these sites to receive units.
 - Lahaina Recreation Center – 120 units
 - Lahainaluna School – 48 units
 - Lahaina Civic Center – 44 units
 - Hawai'i Housing Finance and Development Corporation (TMK 4-5-021:003) – 24 units
 - Front Street Apartments/Lahaina Surf – 80 units
 - **Privately held properties that may be available for temporary housing sites.** Again, while these sites are not immediately shovel ready, the infrastructure and site development challenges could be addressed.
 - Kamehameha Schools – 200 units
 - Pioneer Mill – 157 units
 - Kā'anapali (near Civic Center) – 321 units
 - Maui Land and Pineapple – 114 units

In total, we believe there are adequate sites for more than 2,000 temporary housing units. We hope that FEMA will not allow a lack of appropriate sites to be a barrier for additional temporary housing units moving forward.

Finally, we understand that Hawai'i's state and local permitting and other administrative procedures can present a challenge relative to other communities in the country. To be clear, under emergency powers, the State and County reaffirm our commitments to waive laws necessary to meet the site demand for water service, sewer service, electric services, leasing, environmental preservation, historic preservation, school levies, construction permitting, transportation services, and all other relevant policies and procedures. We ask that FEMA alert our offices immediately should any such policy or procedure become a challenge to the urgent construction of temporary housing units.

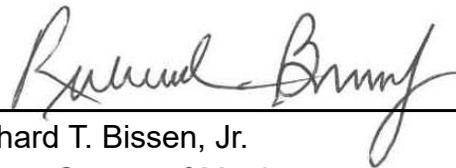
The Honorable Deanne Criswell
Page Three of Three
April 1, 2024

The State of Hawai'i and County of Maui appreciate your office's continued partnership and commitment to the recovery of the survivors.

Sincerely,



Josh Green, M.D.
Governor, State of Hawai'i



Richard T. Bissen, Jr.
Mayor, County of Maui



EXECUTIVE CHAMBERS
KE KE'ENA O KE KIA'ĀINA

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

APR 24 2024

Mr. Forrest Lanning
Joint Housing Task Force Lead
DR4724-HI – Maui Wildfires
U.S. Department of Homeland Security
Federal Emergency Management Agency, Region IX
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Aloha Mr. Lanning:

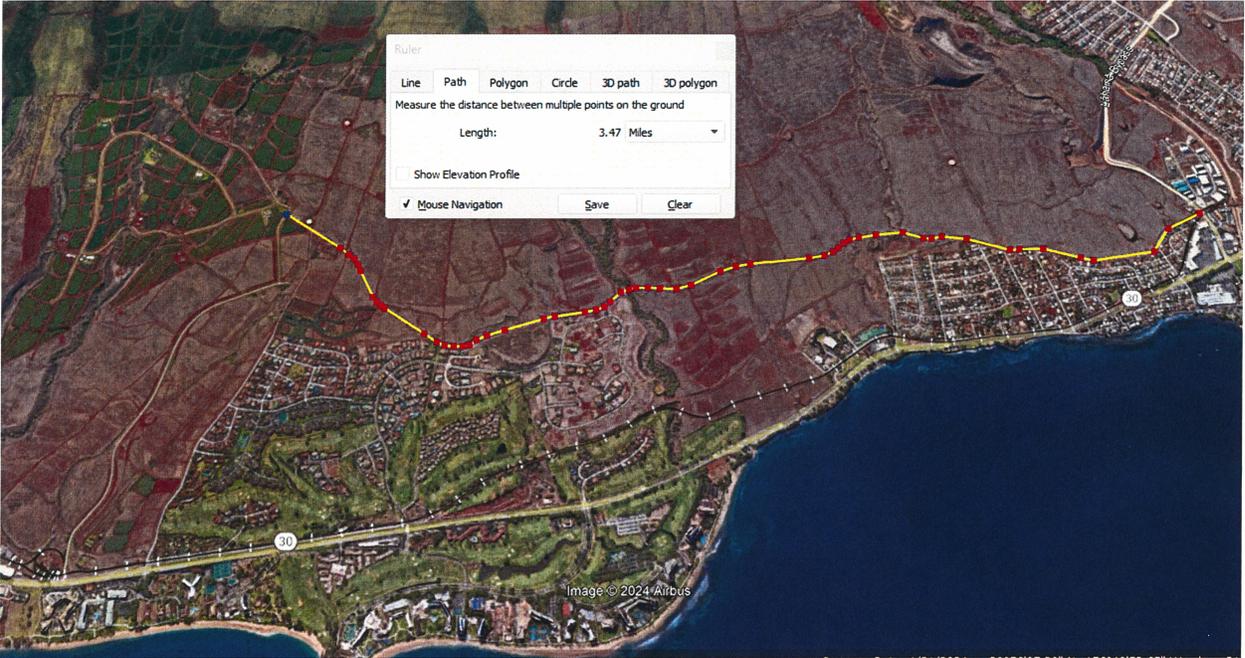
The State of Hawai'i would like to request the Federal Emergency Management Agency's (FEMA) and/or the United States Army Corps of Engineers' (USACE) contractor to pave Cane Haul Road from Keawe Street to Kaka'alaneo Street. Cane Haul Road will provide an alternate route to reduce impacts to Fleming and Leiali'i and provide emergency access for the region should impacts occur.

As the emergency housing is going above existing subdivisions, there is significant concern that both the FEMA and State housing will produce significant traffic that will overwhelm the existing subdivisions. Although the communities are cognizant of the housing need, they are concerned about the impacts on congestion and safety.

Paving the Cane Haul Road from Keawe Street to Kaka'alaneo Street would allow two more connection points to the system where relief can be provided. From there, we could adjust access points to maximize efficiency and safety.

Specifics of the request are:

- 3.5 miles long (see map below)
- 22-ft. width (two 11-ft. lanes) with grass shoulders
- Pavement section: 3" hot mix asphalt (HMA) over 4" aggregate base over non-woven geotextile fabric
- Estimated cost: \$6.5 million



Mahalo,

A handwritten signature in black ink that reads "Josh Green". The signature is fluid and cursive.

Josh Green, M.D.
Governor, State of Hawai'i

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

August 13, 2024

Mr. Toney Raines, Federal Coordinating Officer
DR-4724-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: DR-4724-HI Individuals and Households Program (IHP) Extension Request

Background

On August 10, 2023, FEMA issued a Major Disaster Declaration authorizing Individual Assistance (IA) for the State of Hawai'i.

At the request of the State of Hawai'i (the "State"), FEMA authorized the implementation of the Individual and Households Program, including but not limited to Direct Temporary Housing Assistance in the forms of Direct Housing Assistance (DHA), Financial Housing Assistance (FHA), Continued Temporary Housing Assistance (CTHA), and Section 425 Transportation Assistance. The current period of Direct Temporary Housing Assistance ends on February 10, 2025; however, there is a compelling need to extend the direct housing mission. The State of Hawai'i requests a 12-month extension of IHP including DHA, FHA, CTHA, and 425 Transportation Assistance until February 10, 2026.

The State acknowledges that, if an extension is approved, the State must execute an amendment to the FEMA-State Agreement pursuant to 44 CFR § 206.44. In the coming years, the State may need to request additional extensions based on the circumstances of permanent housing construction at that time.

Since the approval of Direct Temporary Housing Assistance, the State has worked closely with local, state, and federal partners to support implementation of sheltering and direct temporary housing, and support disaster survivors in achieving permanent housing solutions. As of August 7, 2024, there were 1,230 households licensed-in to Direct Housing, with 1,199 currently in units, and 64 households on hold awaiting the FEMA group site. For CTHA, as of August 7, 2024, there are 560 approved households and 77 households with applications pending.

Many survivor households are composed of vulnerable populations. It is difficult to find adequate housing units for these households, and potentially others, due to childcare, school enrollment, accessibility, and medical and functional needs.

Ensuring the recovery is needs-based, and administered in a way that equitably serves the local community, reflects FEMA's Post-Disaster Equity Guide,¹ released in November 2023.

Existing Maui Housing Constraints

The County of Maui was already experiencing a severe housing shortage before the wildfires in 2023. The median price for a single family home in the County of Maui in 2023 was \$1.05 million, compared with \$892,500 in Kaua'i County, \$400,000 in Hawai'i County, and \$1.055 million in Honolulu County.² Maui County had the highest median rent of any Hawai'i State counties, at \$2,500 per month.³ Larger properties able to accommodate families were also priced highest in Maui County of all the Hawaiian islands in 2023, with a typical three-bedroom renting for \$3,800 per month, and a four-bedroom for \$5,200.⁴ The short-term rental market made up approximately 15% of the housing stock on Maui in 2023, and half of the property transactions in Maui County involved out-of-state buyers.⁵ In contrast, the short-term rental market makes up 2 per cent of Honolulu County's housing stock, and eight per cent of Hawai'i County's stock.⁶ The University of Hawai'i Economic Research Organization (UHERO) estimates that the volume of short-term rentals in the Hawaiian housing market raises overall housing costs by five per cent. Additionally, UHERO identifies high interest rates, high prices and low supply as pre-existing constraints on the Hawaiian housing market that have been significantly exacerbated by the wildfires.⁷

Section 425 Transportation Assistance

FEMA has provided Section 425 Transportation Assistance support for 67 itineraries of survivor households, of which 49 have been outbound and 18 inbound. This has been an invaluable resource for survivor households who may choose to seek housing elsewhere. Given the housing challenges for Maui, the need for assistance is ongoing. Continuance of Section 425 Transportation Assistance will enable survivor families the ability to relocate or return to the Hawaiian islands as they continue their recovery from this devastating disaster.

Rebuilding Efforts

The State of Hawai'i is constructing new housing units for intermediate housing. An extension of FEMA Direct Housing will allow for additional time for the transition of households into the new units.

¹ <https://www.fema.gov/press-release/20231120/fema-releases-first-ever-post-disaster-equity-guide-local-officials>

² UHERO, The Hawai'i Housing Factbook 2023, p. 3

³ UHERO, The Hawai'i Housing Factbook 2023, p. 8

⁴ UHERO, The Hawai'i Housing Factbook 2024, p. 1

⁵ UHERO, The Hawai'i Housing Factbook 2023, p. 12

⁶ UHERO, The Hawai'i Housing Factbook 2023, p. 12

⁷ UHERO, The Hawai'i Housing Factbook 2024, p. 1

According to HUD's draft DR-4724-HI Housing Impact Assessment, as of September 28, 2023, the geospatial data collected by FEMA reflected 1,595 residential structures were impacted in Lahaina by the wildfire. Of that number, FEMA estimated 1,288 residential structures, consisting of 4,002 single family and multifamily residential units, were destroyed. The rebuilding effort will stress the existing governmental processes for residential construction. For comparison, in the calendar year prior to the disaster, from January through December 2022, the County of Maui issued building permits for 684 units (for which some units received more than one permit) throughout the entire county.⁸

In addition to the stress on the administrative processes, the rebuilding effort will significantly increase demand for construction resources. Even pre-disaster, supply of construction contractors, equipment and materials had not been meeting demand in the State of Hawai'i. The increased demand of the rebuilding effort, particularly as wildfire survivors attempt to rebuild concurrently, will likely create additional and extended delays in the return of survivors to permanent housing. The required increase in contractors on Maui for the rebuilding period will also add further strain to limited housing and accommodation resources.⁹

The State anticipates that Community Development Block Grant – Disaster Recovery (CDBG – DR) funding, if appropriated, could fund part of the rebuilding process. However, it can take over a year from the time Congress makes a CDBG-DR appropriation to the commencement of construction, further extending the rebuilding timeframe, and necessitating a longer-term stay in intermediate housing for survivors.

Insurance Delays and Shortfalls

Survivors continue to experience delays in receiving insurance payouts, and in many cases, did not hold enough coverage to meet the rising cost of rebuilding. This scenario creates uncertainty and delays in the rebuilding process for survivors.¹⁰ An added challenge in future is the exit of insurers from the local market, or only lower levels of coverage available, which may be a deterrent or delay for survivors on the decision to rebuild.

Considering these circumstances, HI-EMA requests the 12-month extension of housing assistance described in this letter, and a response to the letter as soon as possible but no later than December 1, 2024. Timely attention to these matters will enable the Governor and the State of Hawai'i to move forward in meeting the ongoing needs of Maui wildfire survivors and supporting their recovery. It would also better facilitate the State of Hawai'i's connections with other stakeholders and allow the State to manage expectations and set appropriate recovery timeframes.

⁸ <https://www.mauicounty.gov/DocumentCenter/View/138651/2022-Annual-Building-Permits-Detail>

⁹ <https://uhero.hawaii.edu/expansion-intact-but-counties-poised-for-slower-growth/>

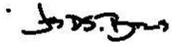
¹⁰ <https://abcnews.go.com/US/maui-residents-post-fire-rebuilding-plans-caught-insurance/story?id=106191624>

August 12, 2024

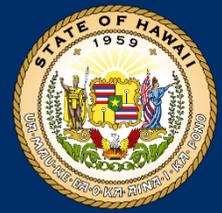
Page | 4

For additional details or inquiries, please reach out to Darrick Ching, Individual Assistance and NCS Task Force Lead, at 808-798-1804 or darrick.j.m.ching@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "James D.S. Barros".

JAMES DS. BARROS
Governor's Authorized Representative



Appendix D

NCS Documentation

Subject	Date of Letter	Sender
Non-Congregate Sheltering Notification	09/08/2023	FEMA
Determination of Uninhabitable Residences	09/28/2023	HIEMA
Additional Uninhabitable Residences	09/29/2023	HIEMA
Non-Congregate Sheltering Reporting Extension Request	10/09/2023	HIEMA
Non-Congregate Shelter Program Reporting Requirement	10/20/2023	FEMA
Non-Congregate Sheltering Program Reporting Requirement	11/01/2023	FEMA
Non-Congregate Sheltering Data Report	11/02/2023	FEMA
Non-Congregate Sheltering Data Report	11/15/2023	FEMA
Comprehensive Data Report: Current as of 12/02/2023	12/11/2023	FEMA
Comprehensive Data Report: Current as of 12/09/2023	12/18/2023	FEMA
Comprehensive Data Report: Current as of 12/13/2023	12/26/2023	FEMA
Non-Congregate Sheltering Program Extension Request	12/28/2023	HIEMA
Data Elements, Reporting Criteria, and Estimated Reimbursable Costs	12/31/2023	FEMA
Comprehensive Data Report: Current as of 12/23/2023	01/02/2024	FEMA
Response to Non-Congregate Sheltering Comprehensive Data Report: Current as of 12/13/2023	01/03/2024	HI-EMA
Non-Congregate Sheltering Data Report	01/09/2024	FEMA
Use of Condominiums and Apartments for NCS Activities under FEMA DR-4724-HI	01/12/2024	HI-EMA
Response to Request for Time Extension through 07/10/2024 (NCS)	01/15/2024	FEMA
Comprehensive Data Report: Current as of 01/07/2024	01/17/2024	FEMA
Response to Non-Congregate Sheltering Comprehensive Data Report: Current as of 01/09/2024	01/17/2024	HIEMA
Response to Non-Congregate Sheltering Extension Request Approval	01/31/2024	HIEMA
Non-Congregate Sheltering January Report and Hotel Market Survey	02/05/2024	HIEMA
Response to Non-Congregate Sheltering Comprehensive Data Report: Current as of 01/23/2024	02/07/2024	HIEMA
Request to Raise ALE Insurance Threshold	02/09/2024	HIEMA
Response to Non-Congregate Sheltering Comprehensive Data Report: Current as of 02/07/2024	02/15/2024	HIEMA

Subject	Date of Letter	Sender
Memorandum Authorizing Use of Condominiums and Apartments for Non-Congregate Sheltering	02/20/2024	FEMA
Request to Raise ALE Insurance Threshold	02/27/2024	HIEMA
Comprehensive Data Report: Current as of 02/25/2024	03/01/2024	FEMA
Non-Congregate Sheltering Program Extension Request	03/01/2024	HIEMA
Response to Non-Congregate Sheltering Comprehensive Data Report: Current as of 03/01/2024	03/08/2024	HIEMA
Determination of Uninhabitable Residences	03/13/2024	HIEMA
State of Hawaii NCS Transition Process Memorandum	03/13/2024	FEMA
Press Release for New Housing Eligibility Policy	03/14/2024	HI-EMA
Use of Condominiums and Apartments for NCS Activities	03/14/2024	HIEMA
NCS Transition to Direct Housing	03/18/2024	HIEMA
Comprehensive Data Report: Current as of 03/17/2024	03/21/2024	FEMA
Comprehensive Data Report: Current as of 03/26/2024	04/01/2024	FEMA
Response to Requests to Extend NCS	04/05/2024	FEMA
Request for Extension of Non-Congregate Sheltering	04/24/2024	HI-EMA
Non-Congregate Sheltering Program Transition Plan	04/25/2024	HI-EMA
Non-Congregate Sheltering Request for Extension to June 10, 2024	05/06/2024	FEMA
Non-Congregate Sheltering Program Extension Request	05/17/2024	HIEMA
Non-Congregate Sheltering Program IA Support	05/22/2024	HIEMA
Use of Condominiums and Apartments for NCS Activities	05/28/2024	HIEMA
Determination of Uninhabitable Residences	05/31/2024	HIEMA
Response to Request to Extend NCS	06/08/2024	FEMA
Requests for Direct Federal Assistance (DFA) & Activation of Transitional Sheltering Assistance (TSA) for Non-Congregate Sheltering FEMA-4724-DR-HI	06/11/2024	FEMA
Response to FEMA DFA Approval of 06/11/2024	06/18/2024	HIEMA
Insurance Coverage for Households in Non-Congregate Sheltering (NCS)	06/21/2024	HI-EMA
FEMA Direct Lease Households without an Interim Housing Solution at NCS Conclusion	06/26/2024	HIEMA



FEMA

September 8, 2023

COL (Ret.) James DS. Barros, Administrator
State Civil Defense / Hawaii Emergency Management Agency
4202 Diamond Head Road
Honolulu, Hawaii 96816

RE: FEMA-4724-DR-HI
Non-Congregate Sheltering Notification,
State of Hawaii Emergency Management Agency

Dear Mr. Barros,

The Federal Emergency Management Agency (FEMA) acknowledges receipt of Hawaii's notice of Non-Congregate Sheltering (NCS), received on August 15, 2023, in a meeting with the Governor. The notice informed FEMA of Hawaii Emergency Management Agency's (Applicant) execution of NCS activities within Maui and Hawaii counties designated under DR-4724-HI, to address the immediate sheltering needs of disaster survivors.

In accordance with Section 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), and further defined in policy, FEMA provides funding for emergency protective measures through the Public Assistance (PA) Program. Generally, FEMA does not provide PA funding for emergency sheltering in non-congregate environments, which are locations where each individual or household has living space that offers some level of privacy (e.g., hotels/motels, dormitories, retreat camps, and bed and breakfasts, including through rental services such as Airbnb). In limited circumstances, such as when congregate shelters are not available or sufficient, FEMA may reimburse costs related to emergency sheltering provided in non-congregate environments.

On June 28, 2022, FEMA issued a memorandum waiving the requirement in the Public Assistance Program and Policy Guide (PAPPG) Version 4, for Applicants to obtain pre-approval before conducting NCS activities in traditional settings. Under the June 28, 2022, memo, the Regional Administrator is authorized to approve NCS in 30-day increments for up to six months from the date of the declaration. On August 16, 2023, and September 6, 2023, the Acting Assistant Administrator for FEMA's Recovery Directorate waived the 30-day incremental extension requirement for this event and extended the deadline for providing the initial eligibility criteria to FEMA, until September 29, 2023.

I approve your request for NCS for up to six months following the August 10, 2023

declaration date. Subject to the conditions and limitations set forth below, the approval period will be valid until February 10, 2024:

1. The Applicant must report to FEMA on the status of those in NCS on a monthly basis with the following information. The first monthly submission shall be provided on September 29, 2023. This will ensure that only individuals and households registered with FEMA with a demonstrated need for continued emergency sheltering remain in NCS facilities. The monthly report should include:
 - a. FEMA Individual Assistance Registration ID (if available)
 - b. Head of household: First and last name and phone number
 - c. Number of individuals in the household
 - d. Damaged dwelling: Street Address, City, State, Zip Code
 - e. Residence habitability status defined as major or destroyed by either FEMA inspection or:
 - i. A municipality determination that the pre-disaster residence is unsafe to occupy due to event;
 - ii. A municipality determination that the damage is permanent, and structure is condemned;
 - iii. If municipality determination is temporary, then the data field will record and end-date for NCS eligibility.
 - f. Date household entered NCS
 - g. Date household exited NCS, if applicable
2. Reporting periods for the Applicant's required monthly submissions are listed below. Reports are due to FEMA on the first business day following the end of the reporting period.
 - a. Period 1: August 15 – September 29
 - b. Period 2: September 30 – October 29
 - c. Period 3: October 30 – November 29
 - d. Period 4: November 30 – December 29
 - e. Period 5: December 30 – January 28
3. FEMA will also provide the Applicant with reports on a weekly basis to identify those who are no longer eligible to remain in NCS. This will allow the Applicant an opportunity to work with individuals and households to review their information and make any necessary corrections.
4. FEMA will use the following criteria to determine eligibility of NCS work and costs beyond September 29, 2023:
 - a. Be in an area declared for Individual Assistance (IA);
 - b. Be registered with IA for disaster assistance;
 - c. Have not requested to withdraw its IA registration;
 - d. Be able to document pre-disaster status as an owner or renter of the primary residence; and
 - e. Have their primary residence determined not to be habitable.

5. Applicants should inform individuals and households that information collected will be shared with FEMA.
6. Applicants must comply with all statutes, regulations, and Executive Orders, including those that require non-discrimination and equitable delivery of FEMA funding to underserved communities. These include, but are not limited to Stafford Act Section 308 (42 U.S.C. § 5151), the Americans with Disabilities Act, the Architectural Barriers Act, Title VI of the Civil Rights Act, and Title 44 of the Code of Federal Regulations (C.F.R.) Part 7. Failure to adhere to these requirements may result in the termination of or refusal to grant Federal assistance.
7. Applicants undertaking the NCS mission assume the responsibility for the occupancy and deactivation of the hotel and motel rooms, including potential eviction of occupants and damage caused if necessary.
8. Reasonableness of these costs will be examined during project formulation and subsequent reviews, with eligible costs being determined prior to award. In accordance with 2 C.F.R. § 200.404, when determining reasonableness of a given cost, consideration will be given to:
 - a. Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.
 - b. The restraints or requirements imposed by such factors as: sound business practices; arms-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.
 - c. Market prices for comparable goods or services for the geographic area.
 - d. Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government.
9. A time extension for NCS past February 10, 2024, will need to be submitted to FEMA by January 10, 2024, and include:
 - a. Written exit strategy that documents the resources and processes that will be employed to ensure all disaster survivors are transitioned to other sheltering, temporary, or permanent housing options within the requested extension period;
 - b. Residence habitability status of each individual and household in NCS during the period for which the Applicant is requesting a time extension; and
 - c. Latest data of individuals and households who need to remain in NCS.

COL (Ret.) James DS. Barros, Administrator
Non-Congregate Sheltering Notification
State of Hawaii Emergency Management Agency
FEMA-4724-DR-HI
Page 2 of 2

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Robert J. Fenton
Regional Administrator
FEMA Region 9

cc: Timothy B. Manner, Federal Coordinating Officer, DR-4724-HI
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

September 28, 2023

Mr. Robert Fenton
Regional Administrator FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI

Dear Mr. Fenton:

We are writing to inform you that the Hawai'i Emergency Management Agency (HI-EMA) has assessed several residences in the Lahaina and Kula burn areas as temporarily uninhabitable. These residences, located in the subdivisions adjacent to the heavily impacted fire areas, remain structurally sound. However, they face daily challenges, including potentially hazardous air particles and/or a lack of potable water and sewer services.

The County of Maui is actively working on the restoration of the water system. Given the necessary testing and infrastructure repairs, it is expected to take weeks before potable water becomes available. Additionally, the County is requesting air quality monitoring assistance from the Department of Health and is addressing dust control through the installation of dust fencing.

Considering these circumstances and based on the County's recommendation, HI-EMA concurs with classifying these identified residences as temporarily uninhabitable until the associated health and safety issues are addressed and mitigated. The situation will be reassessed in 30 days.

Should you require further information or have any questions, please do not hesitate to contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or by phone at 808-620-5410.

Sincerely,

JAMES DS. BARROS
Administrator of Emergency Management

Attached: List and Map of Uninhabitable Residences

Attachment: List Uninhabitable Residences

Lahaina Area	
1	834 S Hakau Pl Lahaina, HI 96761
2	866 S Hakau Pl Lahaina, HI 96761
3	866 S Hakau Pl A Lahaina, HI 96761
4	876 S Hakau Pl Lahaina, HI 96761
5	886 N Hakau Pl Lahaina, HI 96761
6	892 N Hakau Pl Lahaina, HI 96761
7	904 N Hakau Pl Lahaina, HI 96761
8	922 N Hakau Pl Lahaina, HI 96761
9	833 Hokeo St Lahaina, HI 96761
10	840 Hokeo St Lahaina, HI 96761
11	843 Hokeo St Lahaina, HI 96761
12	854 Hokeo St Lahaina, HI 96761
13	855 Hokeo St Lahaina, HI 96761
14	860 Hokeo St Lahaina, HI 96761
15	861 Hokeo St Lahaina, HI 96761
16	867 Hokeo St Lahaina, HI 96761
17	889 Hokeo Pl Lahaina, HI 96761
18	912 Hokeo Pl Lahaina, HI 96761
19	748 Hookahua Pl Lahaina, HI 96761
20	762 Hookahua Pl Lahaina, HI 96761
21	805 S Hopoe Pl Lahaina, HI 96761
22	809 S Hopoe Pl Lahaina, HI 96761
23	813 S Hopoe Pl Lahaina, HI 96761
24	824 Hopoe St Lahaina, HI 96761
25	824 Hopoe St G Lahaina, HI 96761
26	827 Hopoe St Lahaina, HI 96761
27	831 Hopoe St Lahaina, HI 96761
28	840 Hopoe St Lahaina, HI 96761
29	844 Hopoe St Lahaina, HI 96761
30	856 Hopoe St Lahaina, HI 96761
31	864 Hopoe St Lahaina, HI 96761
32	867 Hopoe St Lahaina, HI 96761
33	867 Hopoe St FR Lahaina, HI 96761
34	868 Hopoe St Lahaina, HI 96761
35	871 Hopoe St Lahaina, HI 96761
36	874 Hopoe St Lahaina, HI 96761
37	894 N Hopoe Pl Lahaina, HI 96761
38	897 N Hopoe Pl Lahaina, HI 96761
39	903 N Hopoe Pl Lahaina, HI 96761
40	906 N Hopoe Pl Lahaina, HI 96761

41	909 N Hopoe Pl Lahaina, HI 96761
42	883 Kana Pl Lahaina, HI 96761
43	884 Kana Pl Lahaina, HI 96761
44	889 Kana Pl Lahaina, HI 96761
45	902 Kana Pl Lahaina, HI 96761
46	906 Kana Pl Lahaina, HI 96761
47	913 Kana Pl Lahaina, HI 96761
48	917 Kana Pl Lahaina, HI 96761
49	754 Kuialua St Lahaina, HI 96761
50	755 Kuialua St Lahaina, HI 96761
51	791 Kuialua St Lahaina, HI 96761
52	811 Kuialua St Lahaina, HI 96761
53	816 Kuialua St Lahaina, HI 96761
54	824 Kuialua St Lahaina, HI 96761
55	832 Kuialua St Lahaina, HI 96761
56	835 Kuialua St Lahaina, HI 96761
57	841 Kuialua St Lahaina, HI 96761
58	842 Kuialua St Lahaina, HI 96761
59	845 Kuialua St Lahaina, HI 96761
60	846 Kuialua St Lahaina, HI 96761
61	852 Kuialua St Lahaina, HI 96761
62	855 Kuialua St Lahaina, HI 96761
63	861 Kuialua St Lahaina, HI 96761
64	862 Kuialua St Lahaina, HI 96761
65	865 Kuialua St Lahaina, HI 96761
66	871 Kuialua St Lahaina, HI 96761
67	871 Kuialua St A2 Lahaina, HI 96761
68	872 Kuialua St Lahaina, HI 96761
69	875 Kuialua St Lahaina, HI 96761
70	876 Kuialua St Lahaina, HI 96761
71	882 Kuialua Pl Lahaina, HI 96761
72	886 Kuialua Pl Lahaina, HI 96761
73	887 Kuialua Pl Lahaina, HI 96761
74	898 Kuialua Pl Lahaina, HI 96761
75	899 Kuialua Pl Lahaina, HI 96761
76	904 Kuialua Pl Lahaina, HI 96761
77	911 Kuialua Pl Lahaina, HI 96761
78	810 Kuialua St Lahaina, HI 96761

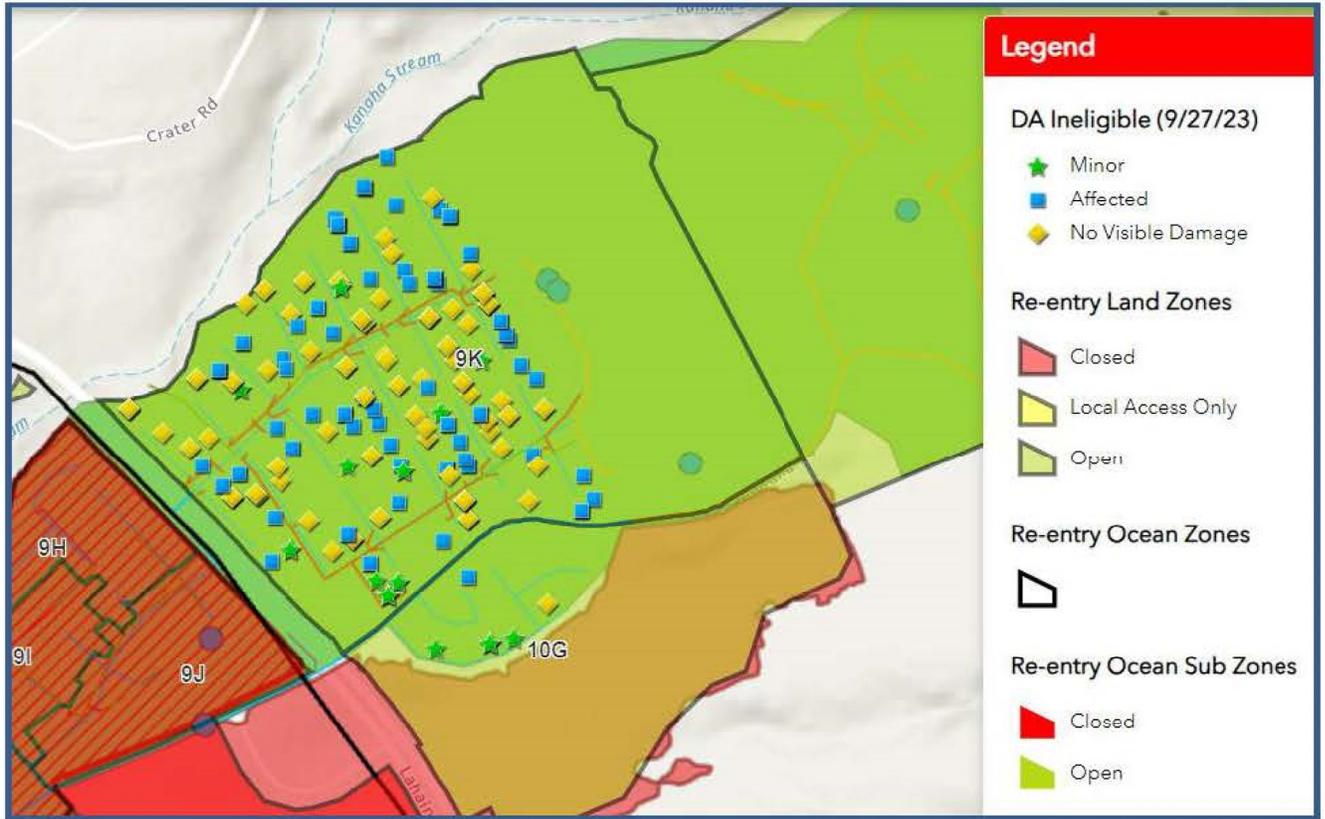
Lahaina Area	
79	832 Kuialua St Upper 2 Lahaina, HI 96761
80	731 Kumukahi St Lahaina, HI 96761
81	742 Kumukahi St Lahaina, HI 96761
82	767 Kumukahi St Lahaina, HI 96761
83	824 Kumukahi St Lahaina, HI 96761
84	808 S Laalo Pl Lahaina, HI 96761
85	823 Laalo St Lahaina, HI 96761
86	824 Laalo St Lahaina, HI 96761
87	829 Laalo St Lahaina, HI 96761
88	830 Laalo St Lahaina, HI 96761
89	835 Laalo St Lahaina, HI 96761
90	836 Laalo St Lahaina, HI 96761
91	841 Laalo St Lahaina, HI 96761
92	842 Laalo St Lahaina, HI 96761
93	847 Laalo St Lahaina, HI 96761
94	848 Laalo St Lahaina, HI 96761
95	854 Laalo St B Lahaina, HI 96761
96	854 Laalo St C Lahaina, HI 96761
97	859 Laalo St Lahaina, HI 96761
98	865 Laalo St Lahaina, HI 96761
99	866 Laalo St Lahaina, HI 96761
100	872 Laalo St Lahaina, HI 96761
101	882 Laalo St Lahaina, HI 96761
102	882 Laalo St B Lahaina, HI 96761
103	889 N Laalo Pl Lahaina, HI 96761
104	890 N Laalo Pl Lahaina, HI 96761
105	896 N Laalo Pl Lahaina, HI 96761
106	901 N Laalo Pl Lahaina, HI 96761
107	908 N Laalo Pl Lahaina, HI 96761
108	914 N Laalo Pl Lahaina, HI 96761
109	919 N Laalo Pl Lahaina, HI 96761
110	925 N Laalo Pl Lahaina, HI 96761
111	931 N Laalo Pl Apt B Lahaina, HI 96761
112	932 N Laalo Pl Lahaina, HI 96761
113	938 N Laalo Pl Lahaina, HI 96761
114	830 Liloa St Lahaina, HI 96761
115	831 Liloa St Lahaina, HI 96761

116	810 S Niheu Pl Lahaina, HI 96761
117	803 S Niheu Pl Lahaina, HI 96761
118	808 S Niheu Pl Lahaina, HI 96761
119	815 S Niheu Pl Lahaina, HI 96761
120	830 Niheu St Lahaina, HI 96761
121	837 Niheu St a Lahaina, HI 96761
122	837 Niheu St B Lahaina, HI 96761
123	843 Niheu St Lahaina, HI 96761
124	844 Niheu St Lahaina, HI 96761
125	850 Niheu St Lahaina, HI 96761
126	859 Niheu St Lahaina, HI 96761
127	860 Niheu St Lahaina, HI 96761
128	864 Niheu St 1 Lahaina, HI 96761
129	868 Niheu St Lahaina, HI 96761
130	871 Niheu St Lahaina, HI 96761
131	872 Niheu St Lahaina, HI 96761
132	876 Niheu St Lahaina, HI 96761
133	880 N Niheu Pl Lahaina, HI 96761
134	884 N Niheu Pl Lahaina, HI 96761
135	887 N Niheu Pl Lahaina, HI 96761
136	888 N Niheu Pl Lahaina, HI 96761
137	906 N Niheu Pl 1 Lahaina, HI 96761
138	912 N Niheu Pl Lahaina, HI 96761
139	917 N Niheu Pl Lahaina, HI 96761
140	918 N Niheu Pl Lahaina, HI 96761
141	940 N Niheu Pl Lahaina, HI 96761

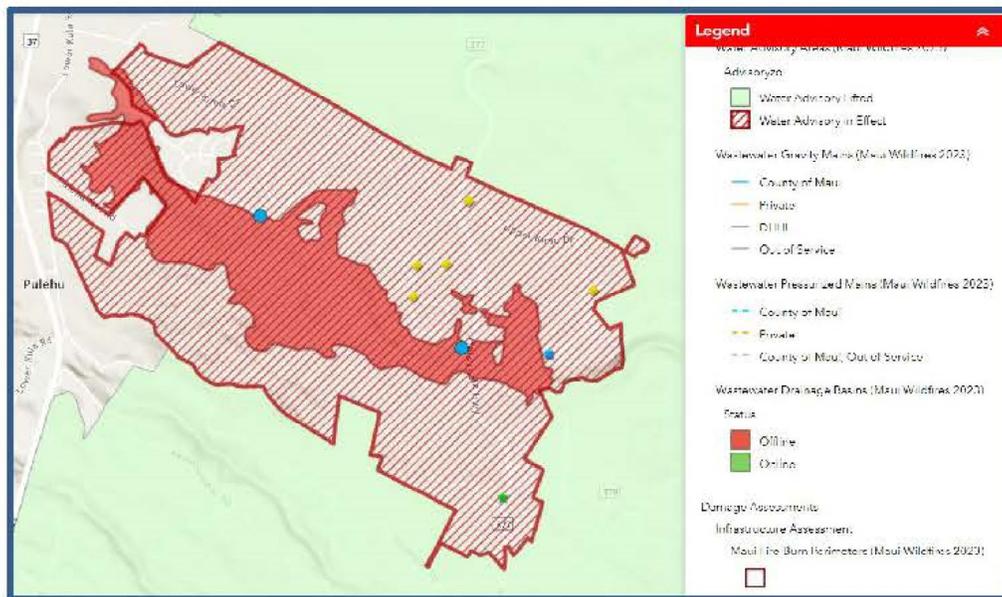
Kula Area	
142	267 Ainakula Rd Kula, HI 96790
143	389 Ainakula Rd Kula, HI 96790
144	3095A Kekaulike Ave Kula, HI 96790
145	105 Kulalani Dr Kula, HI 96790
146	501 Upper Kimo Dr Kula, HI 96790
147	41 Upper Kimo Dr Kula, HI 96790
148	54 Kauai Pl Kula, HI 96790

Attachment: Maps of Uninhabitable Areas

Lahaina Area:



Kula Area:



JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

September 29, 2023

Mr. Timothy B. Manner
Federal Coordinating Officer
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Additional Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI

Dear Mr. Manner:

On September 28, 2023, the Hawai'i Emergency Management Agency (HI-EMA) submitted a determination letter, identifying several residences in the Lahaina and Kula burn areas as temporarily uninhabitable. Today, 4 additional residences located in the same areas are determined to be temporarily uninhabitable.

	Lahaina Area
149	41 Kaniau Rd Lahaina, HI 96761
150	931 N Laalo Place, Lahaina HI 96761
151	36 W Aipuni PL Lahaina, HI 96761
152	833 Hokeo Street Lahaina, Hi

These residences, located in the subdivision adjacent to the Lahaina heavily impacted fire area, remain structurally sound. However, they face daily challenges, including potentially hazardous air particles and/or a lack of potable water and sewer services.

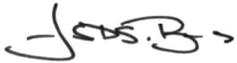
The County of Maui is actively working on the restoration of the water system. Given the necessary testing and infrastructure repairs, it is expected to take weeks before potable water becomes available. Additionally, the County is requesting air quality monitoring assistance from the Department of Health and is addressing dust control through the installation of dust fencing.

Considering these circumstances and based on the County's recommendation, HI-EMA concurs with classifying these additional identified residences as temporarily uninhabitable until the associated health and safety issues are addressed and mitigated. The situation will be reassessed in 30 days.

Mr. Timothy B. Manner
September 29, 2023
Page 2

Should you require further information or have any questions, please do not hesitate to contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or by phone at 808-620-5410.

Sincerely,

A handwritten signature in black ink that reads "J.D.S. B." with a stylized flourish at the end.

JAMES DS. BARROS
Administrator of Emergency Management

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
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PHONE (808) 733-4300
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

October 9, 2023

Mr. Timothy B. Manner
Federal Coordinating Officer
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Non-Congregate Shelter Program Monthly Report
Wildfires, FEMA-4724-DR-HI

Dear Mr. Manner:

Per the Federal Emergency Management Agency (FEMA)'s approval letter dated September 8, 2023, the Hawai'i Emergency Management Agency (HI-EMA) must report to FEMA on the status of those in the non-congregate shelter (NCS) program on a monthly basis. The reports are due to FEMA on the first business day following the end of the reporting period ending on the 29th of every month.

FEMA will provide HI-EMA with weekly reports to identify those who are no longer eligible to remain in NCS. HI-EMA was also informed that the County of Maui must provide FEMA with reports on a weekly basis identifying residences which are temporarily uninhabitable.

HI-EMA needs time to review the monthly report data to resolve duplications and clarity issues; a thorough review is difficult to complete and still meet the one business day deadline. Therefore, HI-EMA is requesting an extension of the submission deadline to five business days following the end of the reporting period. Should you require further information or have any questions, please do not hesitate to contact Lorinda Wong-Lau at lorinda.g.wonglau@hawaii.gov or by phone at 808-620-5410.

Sincerely,

JAMES DS. BARROS
Administrator of Emergency Management



FEMA

October 20, 2023

James DS Barros
Governor's Authorized Representative
Hawaii Emergency Management Agency
4202 Diamond Head Road
Honolulu, Hawaii 96816

RE: FEMA-4724-DR-HI
Non-Congregate Shelter Program Reporting Requirement

Dear Mr. Barros,

On September 8, 2023, the Federal Emergency Management Agency (FEMA) acknowledged and approved Hawaii's notice of Non-Congregate Sheltering (NCS), initially received on August 15, 2023 in a meeting with the Governor. The Hawaii Emergency Management Agency's (Applicant) notice informed FEMA of the State's execution of NCS activities within counties designated under DR-4724-HI, to address the immediate sheltering needs of disaster survivors.

On June 28, 2022, FEMA issued a memorandum waiving the requirement in the Public Assistance Program and Policy Guide (PAPPG) Version 4, for Applicants to obtain pre-approval before conducting NCS activities in traditional settings. Under the June 28, 2022 memo, the Regional Administrator is authorized to approve NCS in 30-day increments for up to six months from the date of the declaration. On August 16, 2023, and September 6, 2023, the Acting Assistant Administrator for FEMA's Recovery Directorate waived the 30-day incremental extension requirement for this event and extended the deadline for providing the initial eligibility criteria to FEMA, until September 29, 2023. On September 8, 2023, the authorized period for NCS was extended until February 10, 2024.

This letter amends and supersedes FEMA's September 8, 2023 approval. Specifically, FEMA will be implementing daily reporting on the status of those registered in NCS, and clarifying the data required for monthly reporting. Although this will be administratively difficult for both the State's contractors and FEMA, more frequent reporting is essential to capture accurate and current information on households in NCS. This will allow FEMA to inform and assist the State prior to their seeking reimbursement, and maximize the amount of funding eligible for Public Assistance (PA) reimbursement.

FEMA appreciates Hawaii's continued assistance thus far in providing the requested data regarding the individuals and households sheltered. However, FEMA has encountered

significant discrepancies within the data provided on NCS registrants. This has been an ongoing issue since FEMA began receiving NCS registrant data on September 6, 2023, and has become critically important since the end of the Safe Harbor period on September 29, 2023.

For the NCS mission being administered through American Red Cross, the most recently provided data on October 6, 2023, indicates that 2,765 households comprised of 6,863 individuals remain in NCS. Of those, 2,128 households have been data matched to a FEMA registration, which represents a 23% discrepancy. For the separately administered NCS utilizing Airbnb, representing 178 households comprised of 488 individuals, none of the data received is currently matchable because of missing data elements. If data cannot be matched, FEMA will be unable to reimburse those NCS costs through the PA program. Thus, the State is risking substantial unanticipated expenses unless and until these issues are resolved.

Due to the data issues identified above, I am now requiring the Applicant to report on NCS data on a daily basis, with additional data points compared to previous reports, to ensure we can resolve the data inconsistencies and maximize PA reimbursement. This daily reporting requirement will start on Monday, October 23, 2023, and is subject to the following:

1. All of the following data points will need to be included in the daily report:
 - a. FEMA Individual Assistance Registration ID (if available);
 - b. Head of household: First and last name and phone number;
 - c. Number of individuals in the household;
 - d. Damaged dwelling: Street Address, City, State, Zip Code; and
 - e. Current shelter name (i.e., hotel name or Airbnb address).

In addition, FEMA is seeking to amend the Data Sharing Agreement with HIEMA to include the following elements, which will assist both the State and FEMA with determining eligibility for reimbursement:

- f. Date(s) household entered NCS;
 - g. Date(s) household exited NCS, if applicable; and
 - h. Number of rooms per household per night.
2. FEMA will provide the Applicant with updated daily reports identifying the eligibility status of registrants remaining in NCS. This will ensure the State understands which NCS costs may be eligible for PA reimbursement. For households whose status changes from eligible to ineligible, based on the criteria below, FEMA will not reimburse for NCS costs for those households beginning seven days after notification to the Applicant, or after the date the Applicant otherwise became aware of ineligibility.
3. FEMA will use the following criteria to identify registrants who were not eligible

- initially, or have become ineligible, for NCS work and costs:
- a. The registrant does not meet all of the eligibility criteria outlined in the September 8, 2023 NCS approval letter, including:
 - i. FEMA has been unable to verify the registrant's identity or IA eligibility, or
 - ii. FEMA has been unable to confirm the registrant's occupancy in an affected residence;
 - b. FEMA is not able to accurately match the NCS head of household to a valid FEMA registration;
 - c. Multiple rooms are utilized by a single household without sufficient, documented justification;
 - d. The household does not include a FEMA-eligible registrant. When multiple rooms are utilized, all rooms must be linked to the FEMA-registered head of household;
 - e. The registrant's pre-disaster primary residence is safe to occupy based on FEMA's home assessment, and the registrant can return to their home. This includes homes which have completed repairs, or any members of the household have elected to continue to occupy while repairs are ongoing;
 - f. The household has been licensed into Direct Housing through FEMA;
 - g. Any member of the household has received Section 425 Transportation Assistance for air travel through FEMA;
 - h. The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment, and has not demonstrated exhaustion of this benefit;
 - i. The household has obtained alternate temporary or long-term housing, to include placement through a voluntary agency; or
 - j. The registrant has previously vacated NCS and subsequently returned.
4. The above daily reports are in addition to the current monthly reporting requirement, which will continue. Monthly reports should list all registrants who were in NCS at any point during the reporting period. The monthly report will serve as a summary, and only needs to contain head of household (first and last name), FEMA registration ID, household size, NCS hotel utilized, number of rooms, and check-in/check-out dates. Each room needs to be listed under the head of household registered with FEMA. This information is necessary to validate monthly invoices and avoid delays and errors in FEMA PA reimbursement. The monthly report can also be used as an opportunity for the State to provide additional justification, as needed, for registrants identified as potentially ineligible during the reporting period.
5. All other conditions stated in my letter informing you of the approval of NCS, dated September 8, 2023, remain unchanged.

James DS. Barros
Governor's Authorized Representative
Hawaii Emergency Management Agency
Re: Non-Congregate Shelter Program Reporting Requirement
FEMA-4724-DR-HI
Page 4 of 4

In addition to documenting NCS eligibility for each registrant, the Applicant must ensure that costs incurred for NCS facilities are reasonable for PA reimbursement. Average hotel rates have decreased since the date of the major disaster declaration over two months ago. To ensure reasonable rates are being utilized for hotels, the Applicant must provide a market survey justifying current hotel rates for NCS activities by October 27, 2023 and every subsequent 30 days.

Finally, I understand the Applicant is considering the use of condominiums and apartments for NCS activities. The Applicant is currently only approved for PA reimbursement for NCS activities in traditional settings, which is limited to hotels/motels, dormitories, and retreat camps per the June 28, 2022 NCS memo. Condominiums and apartments are considered non-traditional settings for NCS activities and pre-approval is required from FEMA's Assistant Administrator for Recovery to be eligible for PA.

If you have any questions regarding this matter, please contact Michael Gaynard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Robert Fenton
Regional Administrator
FEMA Region 9

cc: Thomas J. Dargan, Federal Coordinating Officer, FEMA-4724-DR-HI
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

November 1, 2023

Mr. Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Dear Mr. Dargan:

Non-Congregate Shelter Program Eligibility Requirements
Wildfires, FEMA-4724-DR-HI

In accordance with Section 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) provisions of funding for emergency protective measures through the Public Assistance (PA) Program, the Federal Emergency Management Agency (FEMA) approved Non-Congregate Sheltering (NCS) for Maui County under DR-4724-HI in a letter dated September 8, 2023. FEMA waived the requirement to request extensions for NCS every thirty (30) days, and instead approved NCS for a 6-month period until February 10, 2024.

The approval letter explained the conditions and limitations that the State agreed to provide in a monthly report:

- a. FEMA Individual Assistance Registration ID (if available)
- b. Head of household: First and last name and phone number
- c. Number of individuals in the household
- d. Damaged dwelling: Street Address, City, State, Zip Code

- e. Residence habitability status defined as major or destroyed by either FEMA inspection or:
 - i. A municipality determination that the pre-disaster residence is unsafe to occupy due to event;
 - ii. A municipality determination that the damage is permanent, and structure is condemned;
 - iii. If municipality determination is temporary, then the data field will record and end-date for NCS eligibility.
- f. Date household entered NCS
- g. Date household exited NCS, if applicable

Subsequently, FEMA sent a letter dated October 20, 2023, with an additional set of requirements to identify households that are ineligible for FEMA NCS funding. Four (4) of the additional requirements require more clarity:

FEMA additional requirement e. The registrant’s pre-disaster primary residence is safe to occupy based on FEMA’s home assessment, and the registrant can return to their home. This includes homes which have completed repairs, or any members of the household have elected to continue to occupy while repairs are ongoing;

State’s Concern: In some target neighborhoods where residences have been deemed habitable, the County of Maui has requested the State Department of Health (DOH) to conduct air and soil sampling to determine habitability. Until the results determine these locations are safe, the County is deeming habitability as “undetermined.” Recommend the requirement be amended to read “The registrant’s pre-disaster primary residence is safe to occupy based on FEMA’s home assessment **and the County of Maui’s assessment**, and the registrant can return to their home.

FEMA additional requirement h. The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment, and has not demonstrated exhaustion of this benefit;

State’s Concern: This information is currently not being shared with the State or the State’s NCS contractor, the American Red Cross (ARC). When the State is notified and the information has been confirmed, the household will be transitioned out of NCS.

FEMA additional requirement i. The household has obtained alternate temporary or long-term housing, to include placement through a voluntary agency; or

State’s Concern: This information is currently not being shared with the State or ARC. When the State is notified and the information has been confirmed, the household will be transitioned out of NCS. Restricting the ability to seek sheltering through NCS between options will severely impact community and survivor recovery

FEMA additional requirement j. The registrant has previously vacated NCS and subsequently returned.

State's Concern: Households voluntarily leave NCS for a variety of reasons including planned travel and alternative housing options with friends and family. If the household left NCS in good standing, the State believes they are eligible to re-enter NCS as long as NCS is available. Restricting the ability to seek sheltering through NCS between options will severely impact community and survivor recovery

The State believes the additional reporting requirements requested are beyond the original intent of the NCS policy and cause undue burden to both the survivor and supporting entities attempting to support their recovery. Additionally, the State understands the additional requirements were requested by FEMA because of identified discrepancies to match ARC and Airbnb NCS data, which have largely been rectified.

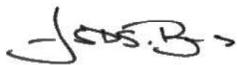
According to the most recent NCS Decompression meeting on October 27, 2023, FEMA and ARC data is currently matched within 96%, moving closer to a 100% match. The Airbnb data set is pending a Data Sharing Agreement amendment.

HI-EMA requests

- additional requirement e be amended to read “The registrant’s pre-disaster primary residence is safe to occupy based on FEMA’s home assessment **and the County of Maui’s assessment**, and the registrant can return to their home.”
- additional requirements h and I be amended to read “..and the State is notified, and the information has been confirmed”
- requirement j be rescinded.

If you have any questions or require additional information, please contact Ms. Lorinda Wong-Lau, Resilience Branch Chief, at lorinda.g.wonglau@hawaii.gov or at 808-620-5410.

Sincerely,



JAMES DS. BARROS
Administrator of Emergency Management



FEMA

November 2, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering Data Report, FEMA-4724-DR-HI

Dear Administrator Barros:

On September 8, 2023, the Federal Emergency Management Agency (FEMA) acknowledged and approved Hawaii's notice of Non-Congregate Sheltering (NCS), initially received on August 15, 2023, in a meeting with the Governor. The Hawaii Emergency Management Agency's (Applicant) notice informed FEMA of the State's execution of NCS activities within counties designated under DR-4724-HI, to address the immediate sheltering needs of disaster survivors. The authorized period for NCS was extended until February 10, 2024.

On October 20, 2023, the FEMA Region 9 Regional Administrator amended and issued a letter superseding the September 8, 2023, approval. Specifically, effective October 23, 2023, the State is required to send daily reporting on the status of those registered in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of those eligible for reimbursement under FEMA's Public Assistance (PA) Program.

To this end, FEMA is providing the following information from the NCS daily reporting as of the data provided on 10/27/2023.

Total Matched Households:	2,545
Non-Primary Residence	-10
Withdrawn Status	-41
Failed Occupancy Verification	-177
Failed Ownership Verification	-69
Failed Identity Verification	-17
Have Homeowners Insurance	-390
Have Renters Insurance	-138
No Habitability Repair required	-170
Total eligible for reimbursement	1,533

Of the total 2,545 households matched within the data provided, 1,012 households have been identified as meeting one or more of the criteria which identifies them as ineligible for continued NCS reimbursement. Per the October 20, 2023 letter, the households will remain eligible for up to 7 days from the date of this notification (November 8, 2023). The table above identifies the ineligibility reason which was first identified; however, each ineligible household is only listed once and may also meet one or more of the ineligibility criteria listed below it. The corresponding report provided for this letter will allow the State to identify any and all ineligibility criteria for all matched NCS households.

In determining the information summarized above, FEMA used the following criteria to identify registrants who were not eligible initially, or have become ineligible, for NCS work and costs:

- a. The registrant does not meet all of the eligibility criteria outlined in the September 8, 2023 NCS approval letter, including:
 - i. FEMA has been unable to verify the registrant's identity or IA eligibility, or
 - ii. FEMA has been unable to confirm the registrant's occupancy in an affected residence;
- b. FEMA is not able to accurately match the NCS head of household to a valid FEMA registration;
- c. Multiple rooms are utilized by a single household without sufficient, documented justification;
- d. The household does not include a FEMA-eligible registrant. When multiple rooms are utilized, all rooms must be linked to the FEMA-registered head of household;
- e. The registrant's pre-disaster primary residence is safe to occupy based on FEMA's home assessment, and the registrant can return to their home. This includes homes which have completed repairs, or any members of the household have elected to continue to occupy while repairs are ongoing;
- f. The household has been licensed into Direct Housing through FEMA;
- g. Any member of the household has received Section 425 Transportation Assistance for air travel through FEMA;
- h. The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment, and has not demonstrated exhaustion of this benefit;
- i. The household has obtained alternate temporary or long-term housing, to include placement through a voluntary agency; or
- j. The registrant has previously vacated NCS and subsequently returned.

FEMA reiterates its appreciation of Hawaii's continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where ineligibility criteria is updated, please provide this information provide the reconciled data within a single report including adequate justification within the 7 day grace period of continued eligibility.

James DS Barros, Administrator
NCS Data Report
FEMA-4724-DR-HI
Page 3 of 3

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Robert Fenton, Regional Administrator, FEMA Region 9
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9



FEMA

November 15, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering Data Report, FEMA-4724-DR-HI

Dear Administrator Barros:

On September 8, 2023, the Federal Emergency Management Agency (FEMA) acknowledged and approved Hawaii's notice of Non-Congregate Sheltering (NCS), initially received on August 15, 2023, in a meeting with the Governor. The Hawaii Emergency Management Agency's (Applicant) notice informed FEMA of the State's execution of NCS activities within counties designated under DR-4724-HI, to address the immediate sheltering needs of disaster survivors. The authorized period for NCS was extended until February 10, 2024.

On October 20, 2023, the FEMA Region 9 Regional Administrator amended and issued a letter superseding the September 8, 2023, approval. Specifically, effective October 23, 2023, the State is required to send daily reporting on the status of those registered in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of those eligible for reimbursement under FEMA's Public Assistance (PA) Program.

On November 2, 2023, FEMA provided a data match, identifying 1,012 ineligible households (HH) within the total of 2,545 HHs receiving a match, based upon the NCS daily report provided by HIEMA on 10/27/2023. The number of ineligible HHs was subsequently amended to 985 based on a correction of HHs with multiple eligibility issues, therefore this letter addresses the updated 985 total HHs identified as ineligible within the previous letter. Below is a status of those HHs with ineligibility reasons that may be reviewed within the corresponding data provided with this letter.

Ineligible Households per Notification Letter sent 11/2/23:	985
Reimbursable	50
Pending Data	492
Non-reimbursable	183
Checked out/Never checked in	260

Of the total 985 households identified as meeting one or more of the ineligibility criteria, and currently in NCS, a total of 50 HHs remain eligible, 492 HHs have shown progress and will remain reimbursable for one additional week for any updated information received to reflect in our systems and associated Data Match reporting. Therefore, consistent with the October 20, 2023 letter, a total of 542 households will remain reimbursable for up to 7 days from the date of this correspondence.

The 492 “pending data” HHs identified as remaining eligible for up to 7 days from the date of this letter are representative of the following:

- HHs with insurance who have not provided sufficient information to determine that they have exhausted ALE/LOU, to include insurance plan, insurance claim, and documented evidence of ALE/LOU exhaustion. For HHs that have not yet received their insurance claim and ALE/LOU funds, provide documentation that they have submitted the claim and their case is pending.
- HHs that have “No” or “0” listed under “Habitability Repairs Required” (HRR) data field and which the State has not provided specific justification for those HHs having a municipality determination of uninhabitability. The information previously provided by the State and County on 10/29/2023 does not identify the HHs remaining in NCS, and does not include specific reports for each NCS HH with specific determinations for each HH justifying they are prohibited from returning home at the order of the Municipality (Maui County).

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where ineligibility criteria is updated, please provide the reconciled data within a single report including adequate justification within the 7 day grace period.

Since the October 27, 2023 data match, which identified 2,545 HHs in NCS (1,012 ineligible; updated to represent 985 HHs), the data match from recent reports exhibited a significant increase to the matched HHs ever reported to have been sheltered in NCS hotels and AirBNBs. Therefore, the table and associated report referenced in this letter do not include any additional HHs which have been matched or accepted into NCS since the October 27 Data was provided. To allow for the original data to be clearly adjudicated, FEMA will issue an additional letter in the coming days with the associated data match report to capture any additional ineligible HHs based on those recently matched and being sheltered within the State’s NCS operations.

Moving forward, FEMA will require notification of any HH entering NCS under the state’s “exception program”, including any HH returning to NCS under the state’s exception program. As part of these notifications to be provided to FEMA Individual Assistance, the State will be required to perform a case review for each HH, and provide this information and data to FEMA for eligibility review. Additionally, please provide a copy of the exception list under which the State and its contractors are accepting HHs into NCS upon receipt of this letter.

James DS Barros, Administrator
NCS Data Report
FEMA-4724-DR-HI
Page 3 of 3

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Robert Fenton, Regional Administrator, FEMA Region 9
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9



FEMA

December 11, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of December 2, 2023, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received by HIEMA on December 2, 2023, and processed by FEMA on December 7, 2023.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, attached to this correspondence as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations, as well as those currently in NCS and referenced within this letter, to allow the State to identify the specific households referenced within the table below. Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 434 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" numbers in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may

affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH remaining in NCS which have been licensed into direct lease (11 HH), utilized Section 425 Transportation Assistance (2 HH), or are being sheltered within a non-traditional NCS setting (388 HH). The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2,473
FEMA Registrations Matched to HH Currently in NCS	2,039
FEMA Registrations Reimbursable	1,218
FEMA Registrations Pending	147
FEMA Registrations Non-Reimbursable	674

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	2
No Contact or Withdrawn	70
Failed Occupancy Verification	28
Failed Identity Verification	11
Have Insurance AND Have Not Received Rental Assistance	372
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling or P2 - Found Another Housing Resource	89
Count of Registrations with Multiple Non-Reimbursable Reasons	102

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where ineligibility criteria is updated, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Thomas J. Dargan, Federal Coordinating Officer, FEMA-4724-DR-HI
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9



FEMA

December 18, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of December 9, 2023, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received by HIEMA on December 9, 2023, and processed by FEMA on December 14, 2023.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this correspondence and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheets data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 335 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information

available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH being sheltered within a non-traditional NCS setting (410 HH). The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2430
FEMA Registrations Matched to HH Currently in NCS	2095
FEMA Registrations Reimbursable	1233
FEMA Registrations Pending	145
FEMA Registrations Non-Reimbursable	717

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	3
No Contact or Withdrawn	71
Failed Occupancy Verification	32
Failed Identity Verification	12
Have Insurance AND Have Not Received Rental Assistance	387
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling or P2 - Found Another Housing Resource	100
Travel Completed Utilizing Section 425 Transportation Assistance	2
Licensed into a Temporary Housing Unit under FEMA Direct Temporary Housing Assistance	9
Count of Registrations with Multiple Non-Reimbursable Reasons	101

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data

regarding the individuals and households sheltered. If there are any households where non-reimbursement reasons have been addressed and updated information has been received, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Maona Ngwira
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Thomas J. Dargan, Federal Coordinating Officer, FEMA-4724-DR-HI
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9



FEMA

December 26, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of December 13, 2023, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received by HIEMA on December 13, 2023, and processed by FEMA on December 21, 2023.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this correspondence and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheets data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 163 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH being sheltered within a non-traditional NCS setting (396 HH). The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2226
FEMA Registrations Matched to HH Currently in NCS	2063
FEMA Registrations Reimbursable	1215
FEMA Registrations Pending	141
FEMA Registrations Non-Reimbursable	707

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	3
No Contact or Withdrawn	71
Failed Occupancy Verification	31
Failed Identity Verification	10
Have Insurance AND Have Not Received Rental Assistance	373
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	107
Travel Completed Utilizing Section 425 Transportation Assistance	2
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	13
Count of Registrations with Multiple Non-Reimbursable Reasons	97

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where non-reimbursement reasons have been addressed and updated information has been received, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

James DS Barros, Administrator
NCS Data Report
FEMA-4724-DR-HI
Page 3 of 3

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII

**DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA**

OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

December 28, 2023

Mr. Thomas J. Dargan, Federal Coordinating Officer
U.S. Department of Homeland Security
Federal Emergency Management Agency

RE: FEMA-4724-DR-HI
Non-Congregate Sheltering
Request for Extension to July 10, 2024

Dear Mr. Dargan:

The Hawai'i Emergency Management Agency (HIEMA) on behalf of the State of Hawai'i (the "State") is requesting an extension of Non-Congregate Sheltering (NCS) for residents affected by the Maui Wildfires under FEMA-4724-DR-HI from February 10, 2024 to July 10, 2024.

The State originally requested NCS from the Federal Emergency Management Agency (FEMA) on August 15, 2023 to address immediate sheltering needs of wildfire disaster survivors. FEMA subsequently approved the State's request on September 8, 2023 for the period of August 10, 2023 to February 10, 2024.

Even before the wildfires in August 2023, Maui faced a significant housing shortage. When the wildfires hit the island, more than 2,000 structures were severely damaged or destroyed, of which over 96% were residential. Finding intermediate or permanent housing for the wildfire survivors has been difficult and the challenge will continue into the immediate future.

After evaluating the available options to address immediate housing needs for residents affected by the Maui Wildfires, it has been determined that NCS program continues to be the most feasible and viable sheltering option for disaster survivors until sufficient intermediate housing options are identified.

The decision to use hotel units is guided by a focus on keeping families in or near their home communities, allowing survivors to quickly recover by maintaining access to their jobs, schools, medical providers, and

Mr. Thomas J. Dargan, Federal Coordinating Officer
U.S. Department of Homeland Security
Federal Emergency Management Agency
Non-Congregate Sheltering Extension FEMA-4724-DR-
HI
Page 2 of 2

other critical community resources. All these principals align with FEMA's National Disaster Housing Strategy and the event specific strategies supported by Maui and the State of Hawai'i. We can ill afford to eliminate this critical lifeline to disaster survivors until direct intermediate housing options have been made available through FEMA's Housing program, as well as, state, county, and other programs.

The extension is crucial to assisting survivors through NCS as they navigate recovery programs, locate rental resources, repair damaged dwellings, and transition to longer-term housing options.

As of December 27, 2023, there were 2,592 households (6,060 people) in Non-Congregate Sheltering in Maui hotels. Although the current count in NCS is down from highs of 3,100 households (8,000 people) across 40 hotels in late September 2023, there is still a significant amount of NCS households to find intermediate or permanent housing options.

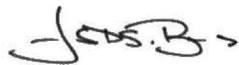
All NCS households have been assigned an American Red Cross case manager and will soon to be assigned a case manager through the Disaster Case Management Program. The procured case management vendor will develop special NCS transition options with each survivor to determine longer-term housing solutions, as well as ongoing personal recovery assistance.

Collaborative efforts at the Federal, State, County, and Private Non-Profit levels are ongoing to identify additional housing resources via direct lease, rental assistance, public and private sites for potential group sites for alternate housing units, etc. to assist eligible survivors to move from sheltering to interim housing as quickly as possible.

HIEMA believes that extending NCS is necessary, offering immediate stability for survivors until longer-term resources are available. We seek an extension under the FEMA Public Assistance program, per 44 C.F.R. §206.204 (c) (2) (ii) and appreciate FEMA's partnership and support in assisting Maui Wildfires survivors.

Should you have any questions, please contact Darrick Ching, DR-4724 Joint Housing Task Force, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative



FEMA

December 31, 2023

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Subject: Update on Non-Congregate Sheltering:
Data Elements, Reporting Criteria, and Estimated Reimbursable Costs
FEMA-4724-DR-HI

Dear Administrator Barros:

This letter is to provide you and your staff with a general update and rough estimates of the costs incurred to-date by the Federal Emergency Management Agency (FEMA) and the State of Hawai'i for the Non-Congregate Sheltering (NCS) mission under FEMA-DR-4724-HI.

On September 8, 2023, FEMA acknowledged and approved Hawai'i's notice of NCS. The initial approval letter was amended and superseded within FEMA's October 20, 2023, letter updating both NCS reporting and eligibility criteria, with follow-up correspondence on November 15, 2023, clarifying certain criteria.

Current Reimbursement Estimate

Below is a rough estimate of costs based on a \$1,000 per HH per night rate given HH participation as reported in weekly correspondences with HI-EMA. FEMA did not previously report on Pending or Non-Reimbursable HHs for the month of October, 2023. The October estimates are based solely on the unmatched population reported to be in NCS as of the December 18, 2023, letter to determine a broad estimate for total non-reimbursable costs potentially incurred by the State. Estimated non-reimbursable costs as stated below assumes that the \$10.05 M incurred in October 2023 continues to be reflected in the non-reimbursable costs incurred in subsequent months due to fluctuations in the unmatched population between weekly reporting.

Table 1:

Month	Reimbursable Costs	Non-Reimbursable Costs
October	1,533 HH = \$47,523,000	335 HH = \$10,050,000
November	1,218 HH = \$36,540,000	821 HH = \$24,630,000 (+\$10.05 M = \$36,680,000)
December	1,233 HH = \$38,223,000	862 HH = \$26,712,000 (+\$10.05 M = \$36,762,000)
Total	\$122,286,000	\$83,492,000

It is also important to note that the reimbursable costs as detailed in the table will be subject to the 10% non-federal cost share for any costs incurred outside your continuous 90-Day (100% Federal Share) Cost Share Adjustment period, authorized per Federal Register Notification-Amendment 06 for Category-B “Emergency Protective Measures.”

Also note, as explained below, the NCS population located in condominiums will potentially affect reimbursable costs.

Condominiums used for NCS

Utilization of condominiums for transitional sheltering, including NCS operations, severely depletes the available housing stock on island and significantly undermines survivors’ efforts to identify suitable interim and permanent housing solutions. To date, adverse impacts from the use of condominiums for NCS include survivors’ ability to identify rental resources on which to utilize their rental assistance, FEMA’s ability to obtain units for the Direct Lease program, as well as other state and county efforts to assist survivors with the next phase of their recovery.

As stated in both FEMA’s initial September 8, 2023, NCS approval and subsequent October 20, 2023, correspondence on NCS eligibility criteria, condominiums are not reimbursable shelter types for NCS. Condominiums are considered “non-traditional” NCS settings and therefore require pre-approval from FEMA HQ. Approval for non-traditional NCS has not been granted for FEMA-4724-DR-HI. FEMA has formally notified the State in FEMA’s December 11th, 18th, and 26th NCS Reimbursement Status Letters that NCS in Condominiums are not reimbursable.

The most recent monthly report, provided by HI-EMA with enclosed Hotel Analysis data on December 23, 2023, indicated that 39% of the current NCS population are in condominiums and 61% are in Hotels. This significantly exceeds what FEMA had previously been aware of as HHs currently in condominiums. Additionally, 31 of American Red Cross’ contracts with condominiums are not scheduled to expire until May 2024. As this data is further analyzed, there could be additional impacts on NCS reimbursement estimates as depicted in Table 1 above.

Daily Data Reporting Gaps

FEMA implemented a daily reporting requirement per the October 20, 2023, letter to receive updates on the status of those within NCS and clarified the data requirements for the monthly reporting. The quality of information improved drastically due to this increased reporting requirement. Amendment 04 of the FEMA/HI-EMA Data Sharing Agreement was not fully executed until November 17, 2023, and therefore FEMA could not ingest the three data elements below until that time. Since that time, FEMA has not received complete data to fulfill this updated reporting requirement. This was intended to allow FEMA to inform and assist the State prior to their seeking reimbursement, to capture accurate and current information on households (HHs) in NCS, and to minimize the State’s risk of incurring unanticipated, non-reimbursable expenses.

FEMA amended the reporting criteria requiring the following additional data elements:

- Date(s) HH entered NCS;
- Date(s) HH exited NCS, if applicable; and
- Number of rooms per HH per night

Monthly Reporting Gaps

Monthly data reports received from HI-EMA to date lack critical data points, detailed in the October 20, 2023, correspondence as follows:

- First/Last Name of Head of HH
- Registration ID
- HH size (Number of HH members)
- Number of hotel rooms
- Check In/Check Out Dates
- NCS hotel name

FEMA Public Assistance (PA) has requested that these monthly data reports be provided retroactively to reflect the above criteria. This data must include all HHs who were in NCS at any point during each reporting period. This information is necessary to validate monthly invoices in coordination with your team to ensure PA funding of project amendments can be processed in a timely manner. The monthly reports should also include any additional justification, as needed, for the HHs previously identified as non-reimbursable during the reporting period.

This data must be broken down to reflect these summaries for each of the reporting periods, per HH sheltered in NCS. If the monthly data report cannot be matched to the received billing invoices and the daily NCS reports, FEMA cannot determine reimbursable costs and cannot process the invoices or process any project amendments to increase the obligated amount.

Updated NCS Eligibility Criteria/Clarifications

Based on conversations with HI-EMA and their Contractors, certain eligibility criteria for NCS may require clarification.

1. Individual Assistance (IA) Registration Deadline (December 11, 2023) IA registration is a requirement for NCS eligibility beyond September 29, 2023, known as the end of the “Safe Harbor” period. Any HHs which have not registered for IA before the December 11, 2023, deadline will be considered non-reimbursable for NCS-related costs, except when meeting the following criteria:

- FEMA IA accepts a HH's late registration justification, AND
- The HH subsequently meets all other NCS reimbursement criteria.

2. Section 425 Transportation Assistance

In previous correspondence, FEMA has allowed for a grace period of 7 days following notification for certain HH that become non-reimbursable. However, as explained

within the October 20, 2023, letter ‘FEMA will not reimburse for NCS costs for those HHs after the date the Applicant otherwise became aware of ineligibility.’

HHs which have completed travel utilizing Section 425 Transportation Assistance become non-reimbursable for NCS immediately after travel. As stipulated in the October 11, 2023, Section 425 Transportation Assistance approval, all household members must utilize Transportation Assistance and be listed on the FEMA application in order to be considered eligible. Therefore, there is no justification for continued sheltering beyond the recorded travel date.

3. Direct Housing

In general, HHs provided with Direct Housing will become non-reimbursable 7 days following their license-in date. HHs which decline an offer of a Direct Housing unit and subsequently become ineligible for Direct Housing for reasons unacceptable per IA standards, will become non-reimbursable 7 days after the date they are deemed ineligible.

IA has experienced a trend of Direct Lease eligible HHs refusing required background checks. HHs which are eligible for Direct Housing but do not make reasonable efforts to facilitate the Direct Housing process, to include required background checks for Direct Lease, will become non-reimbursable for NCS.

4. All other conditions stated in previous NCS correspondences remain unchanged. This letter is not intended to change reimbursement criteria, with the exception of updated criteria applicable to the IA registration deadline.

If you have any questions regarding this matter, please contact Michael Gayrard, PA Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Robert J. Fenton, Regional Administrator, FEMA Region 9
Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9



FEMA

January 2, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of December 23, 2023, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received by HIEMA on December 23, 2023, and processed by FEMA (data matched) on December 27, 2023.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this correspondence and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheets data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 491 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH being sheltered within a non-traditional NCS setting (715 HH). The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2336
FEMA Registrations Matched to HH Currently in NCS	1845
FEMA Registrations Reimbursable	1119
FEMA Registrations Non-Reimbursable	726

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	0
No Contact or Withdrawn	25
Failed Occupancy Verification	22
Failed Identity Verification	9
Have Insurance AND Have Not Received Rental Assistance	246
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	91
No Habitability Repairs Required or Blank and No GIS Stamp	124
Travel Completed Utilizing Section 425 Transportation Assistance	2
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	9
Count of Registrations with Multiple Non-Reimbursable Reasons	198

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where non-reimbursement reasons have been addressed and updated information has been received, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

James DS Barros, Administrator
NCS Data Report
FEMA-4724-DR-HI
Page 3 of 3

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
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4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

January 3, 2023

Thomas J. Dargan, Deputy Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Response to Non-Congregate Sheltering, Comprehensive Data Report Current as of December 13, 2023, FEMA-4724-DR-HI

Dear Mr. Dargan,

This letter serves as the Hawai'i Emergency Management Agency's (HIEMA) response to the Federal Emergency Management Agency's (FEMA) letter and Non-Congregate Sheltering (NCS) data report from December 26, 2023.

On September 8, 2023 (September 8 letter), FEMA approved Hawai'i's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. In the September 8 letter, FEMA was to provide HIEMA with weekly NCS eligibility reports, so that HIEMA can review current registrants' information and make eligibility corrections as necessary. However, HIEMA only began receiving these weekly reports on December 11, 2023. Prior to the December 11 report, HIEMA had only received NCS eligibility reports from FEMA on November 2, 2023, which was further reorganized in a report dated November 15, 2023.

On November 2, 2023, December 11, 2023, December 18, 2023, and December 26, 2023, HIEMA received letters and data reports from FEMA specifically separating registrations by Nonreimbursable category, as imposed by FEMA in a letter dated October 20, 2023. HIEMA, American Red Cross, and FEMA teams have continually reviewed the data provided by FEMA on the above dates. The results of the most recent reviews are summarized below and in the attached report.

Response to Specific Categories as Outlined by FEMA on December 26, 2023:

Non-Primary Residence:

- Of **3** Households (HHs) whose address is non-primary, HIEMA disagrees with FEMA's determination on all **3** registrations.

No Contact or Withdrawn:

- Of **71** HHs in this category, HIEMA has addressed discrepancies in **49** cases where contact was re-established or withdrawal decisions were reversed. Updated documentation will be provided to FEMA. For **15** households, we concur with FEMA's findings. **7** HHs are still pending review.

Failed Occupancy Verification:

- Of **31** HHs in this category, discrepancies were found in FEMA's data for **17** households. After HIEMA's review, these households have been verified as eligible. For the remaining **13**, we agree with FEMA's non-reimbursable decision. **1** case is still pending review.

Failed Identity Verification:

- Of **10** HHs in this category, HIEMA identified errors in FEMA's data for **8** households. Corrective documentation will be submitted. For the remaining **2**, FEMA's determination is agreed upon.

Have Insurance AND Have Not Received Rental Assistance:

- Of **373** HHs in this category, **373** households are still pending review/resolution. HIEMA has requested assistance from the State Insurance Commission to obtain HH information regarding receipt of Additional Living Expenses (ALE) / Loss of Use (LOU) settlements.

Direct Housing Pre-Placement Interview P1 – Living in Damaged Dwelling or P2 - Found Another Housing Resource:

- Of **107** HHs, HIEMA contests FEMA's decision for **22** households, as further interviews revealed survivor HH misunderstanding of FEMA questions. For **29** households, we agree with FEMA's assessment. **56** cases are pending review/resolution.

Travel Completed Utilizing Section 425 Transportation Assistance:

- Of **2** HHs, HIEMA agrees with FEMA's decision. However, previous reports on Section 425 Assistance have been inaccurate, as shown below.

As a specific example of data inaccuracy, in FEMA's December 26, 2023 letter, FEMA deemed two HH "Non-Reimbursable" under the Public Assistance (PA) program for "Travel Completed Utilizing Section 425 Transportation Assistance." However, in FEMA's December 21, 2023 data report, FEMA deemed four HH "Non-Reimbursable" for "Travel Completed Utilizing Section 425 Transportation Assistance." Upon HIEMA's detailed review of the four HH deemed "Non-Reimbursable" in FEMA's December 26, 2023 report, HIEMA discovered three HH had appropriately checked out of the NCS program before completing their travel. Furthermore, after directly contacting the fourth HH, HIEMA learned that the household never received any FEMA funding, nor did they travel utilizing Section 425 Transportation Assistance. This situation is one example of the inaccuracies in FEMA's data and underscores the need for more reliable and timely communication between FEMA and HIEMA.

HIEMA would like to request further clarification regarding this nonreimbursable status. More specifically, HIEMA would like to understand the criteria used to determine which households' NCS stays are FEMA reimbursable prior to using Section 425 assistance.

Licensed into Direct Lease Unit under FEMA Direct Housing Assistance:

- Of **13** HHs, inconsistencies were found for **8** households, who had already checked out of NCS, contrary to FEMA's data. The rest, as per FEMA's count are still under HIEMA review.

HIEMA would also like to request further clarification regarding this nonreimbursable status. Specifically, HIEMA would like to clarify a HH's reimbursability *before* being licensed into a FEMA-sponsored lease.

Count of Registrations with Multiple Non-Reimbursable Reasons:

- Of **97** HHs, HIEMA finds **16** households' data to be inaccurate. For the remaining **20**, we concur with FEMA's determination. The remaining **61** HHs are in the process of being reviewed.

Mismatched Households:

- HIEMA's NCS contractor, the American Red Cross (ARC), has met with FEMA representatives and has provided explanations for the **163** stated mis-matches and/or has requested guidance from FEMA on how to resolve mismatches. According to ARC, they are still pending a response from FEMA.

HIEMA recognizes and appreciates FEMA's efforts to submit reports to HIEMA in a timely manner. However, given the above circumstances, HIEMA respectfully requests FEMA take immediate measures to improve the accuracy of its data reporting. Additionally, HIEMA requests FEMA review the attached report and make corrections in the National Emergency Management Information System (NEMIS) for the specific cases HIEMA has noted should be Reimbursable under the PA program.

Sincerely,

James DS. Barros

Governor's Authorized Representative



FEMA

January 9, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of December 28, 2023, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received by HIEMA on December 28, 2023, and processed by FEMA (data matched) on January 3, 2024.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this correspondence and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheets data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 506 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH being sheltered within a non-traditional NCS setting (712 HH).

Additionally, per FEMA’s December 31, 2023, correspondence, HHs which decline an offer of a Direct Housing unit and subsequently become ineligible for Direct Housing (6 HH), will become non-reimbursable 7 days after the date they are deemed ineligible. FEMA Individual Assistance is providing a listing of those HH each day.

Request the State analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2336
FEMA Registrations Matched to HH Currently in NCS	1830
FEMA Registrations Reimbursable	1112
FEMA Registrations Non-Reimbursable	718

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	0
No Contact or Withdrawn	24
Failed Occupancy Verification	21
Failed Identity Verification	7
Have Insurance AND Have Not Received Rental Assistance	240
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	92
No Habitability Repairs Required or Blank and No GIS Stamp	124
Travel Completed Utilizing Section 425 Transportation Assistance	2
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	8
Count of Registrations with Multiple Non-Reimbursable Reasons	334

FEMA reiterates its appreciation of Hawaii's continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where non-reimbursement reasons have been addressed and updated information has been received, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

**THOMAS J
DARGAN**

 Digitally signed by THOMAS
J DARGAN
Date: 2024.01.09 11:06:25
-10'00'

Thomas J. Dargan
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Heather R. Smith, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9

JOSH GREEN, M.D.
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January 12, 2024

Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Non-Congregate Sheltering – Use of Condominiums and Apartments for NCS Activities under FEMA DR-4724-HI

Dear Mr. Dargan,

This letter will serve to provide background, context, and justification for the use of available condominium and apartment units for non-congregate sheltering (NCS) of the Maui wildfire survivors.

It is well documented that the Maui Wildfires of August 2023 became the largest and most catastrophic disaster in Hawai'i's history with thousands of homes and structures destroyed, 100 lives lost from the fires, and thousands of Maui residents left homeless.

In the early aftermath of the fires, the State of Hawai'i (State) stood-up a Joint Housing Task Force (JHTF) in direct partnership with FEMA, the American Red Cross (ARC), and many other supporting organizations. The JHTF worked tirelessly to find non-congregate shelter for over 8,000 fire survivors. Finding available hotel rooms to house the impacted families was of highest priority. The JHTF, however, quickly realized there were not sufficient hotel rooms for all of those in need. The group, in collaboration with private industry, was then able to identify an inventory of available condominium units to support those that were not afforded hotel space.

Based on the situation at hand, the ARC on behalf of the State, sent an email request on August 19, 2023 to FEMA for approval to use condominiums for NCS activities. FEMA provided a same-day response approving airbnbs (condos/timeshares) as traditional sheltering options. With FEMA approval, ARC through their vendor Corporate Lodging Consultants (CLC), was able to provide non-congregate shelters to all wildfire survivors in need at the time. Per ARC, condominium units are managed, in every respect, the same as hotels including transactional structure, rates, and acquisition

through ARC's Corporate Lodging vendor. The utilization of condos also lowered both lodging and meal costs.

Per letter to the Hawai'i Emergency Management Agency (HI-EMA) on October 20, 2023 regarding Non-Congregate Shelter Program Reporting Criteria, FEMA stated the following: *"The Applicant is currently only approved for PA reimbursement for NCS activities in traditional settings, which is limited to hotels/motels, dormitories, and retreat camps per the June 28, 2022 NCS memo. Condominiums and apartments are considered non-traditional settings for NCS activities and pre-approval is required from FEMA's Assistant Administrator for Recovery to be eligible for PA."*

Based on the foregoing and the fact that the State of Hawai'i requested FEMA approval for use of condominiums for NCS prior to actual housing of survivor families into units, HI-EMA is requesting formal approval for the use of condominiums and apartments as traditional settings for NCS activities which would therefore be PA reimbursable, under FEMA DR-4724-HI, retroactive to August 19, 2023.

We appreciate FEMA's prompt attention to this matter and continued collaboration as we work to recover from this disaster. Should you have any questions, please contact Darrick Ching, HI-EMA Individual Assistance, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,

On behalf of Administrator, D. Aweau

James DS. Barros
Governor's Authorized Representative

Signature: 

Email: kelli.r.nicklaus-ciccone@hawaii.gov



FEMA

January 15, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Reference: *FEMA-4724-DR-HI*
Non-Congregate Sheltering
Response to Request for Time Extension through July 10, 2024
Applicant: Hawaii Emergency Management Agency (HI-EMA)

Dear Administrator Barros:

This is in response to your letter dated December 28, 2023, requesting an additional 151-day time extension through July 10, 2024, for the continued performance of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration.

I have received concurrence from the Federal Emergency Management Agency (FEMA) Assistant Administrator of the Recovery Directorate (AAR), for conditionally approving this extension request for up to 60-days from the expiration of the current time extension. The Applicant must adhere to the approval criteria FEMA has provided in previous correspondences and the additional criteria and conditions presented herein. For any subsequent time extension requests beyond the authorized 60-day period, the Applicant must submit adequate justification to event leadership demonstrating the continued need for NCS.

This authorization approves a time extension through April 10, 2024. Any requests for additional time extensions beyond this period will need to be submitted 14 days prior to this approval deadline, by March 27, 2024.

Background:

On September 8, 2023, the Federal Emergency Management Agency (FEMA) acknowledged and approved Hawaii's notice of NCS, initially received on August 15, 2023, in a meeting with the Governor. The Hawaii Emergency Management Agency's (HI-EMA) (Applicant) notice informed FEMA of the State's execution of NCS activities within counties designated under FEMA-4724-DR-HI to address the immediate sheltering needs of disaster survivors.

On June 28, 2022, FEMA issued a memorandum waiving the requirement in the Public Assistance Program and Policy Guide (PAPPG) Version 4, for Applicants to obtain pre-approval before conducting NCS activities in traditional settings. Under the June 28, 2022, memo, the Regional

Administrator (RA) is authorized to approve NCS in 30-day increments for up to six months from the date of the declaration. On August 16 and September 6, 2023, the Acting Assistant Administrator for FEMA's Recovery (AAR) Directorate waived the 30-day incremental extension requirement for this event and extended the deadline for providing the initial eligibility criteria to FEMA through September 29, 2023, which has commonly been referred to as the "safe harbor" period, respectively.

The FEMA Region 9 Administrator formally granted approval of a time extension for eligible costs to remain reimbursable through February 10, 2024, within the initial approval letter dated September 8, 2023. The initial approval letter was amended and superseded within FEMA's October 20, 2023, letter updating both NCS reporting and eligibility criteria, with additional correspondence on November 15, and December 31, 2023, addressing reimbursement criteria.

FEMA's current policy for NCS is set forth in the PAPPG V4 2020, at p. 123, with some additional flexibilities implemented within the June 2022 Dr. Forbes Memo, issued following increased frequency and implementation of NCS. In general, FEMA limits any approval of NCS activities to that which is reasonable and necessary to address the needs of the incident (usually no more than 30 days). The RA may extend approval for NCS activities conducted for more than 30 days from the incident, but the Applicant is required to use data regarding the individuals and households (HHs) sheltered to demonstrate the need for continued emergency sheltering.

Pursuant to the eligibility requirements outlined in FEMA's policies, the Applicant's previous time extension request for the period of performance for eligible costs associated with NCS activities conducted through February 10, 2024, was approved by the Region 9 Administrator in a letter dated September 8, 2023. The eligibility considerations addressed in the original approval, in addition to the conditions set forth in subsequent letters issued by the RA and Federal Coordinating Officer (FCO) regarding reimbursement criteria for HHs sheltered, are summarized below.

Time extensions beyond February 10, 2024, must be approved by FEMA's AAR. FEMA has received concurrence from the AAR to authorize a conditional approval as detailed in this letter, approving a limited time extension for an additional 60-day period. The new period of performance ends on April 10, 2024.

Current NCS Participation Data:

FEMA appreciates your continued assistance in providing the requested data regarding the individuals and HHs sheltered. Based on the data reported in your request letter, the original population sheltered at the peak of NCS operations was more than 8,000 individuals comprising up to 3,100 HHs, and a total of 6,060 individuals representing 2,592 HHs remain in NCS as of December 27, 2023.

Of the 2,592 sheltered HHs, FEMA was provided a list of 2,336 households in the December 28, 2023, HI-EMA Daily Data Report, which was matched by FEMA on January 3, 2024 and is reported in the table below. FEMA's data matching of this HI-EMA Daily Data Report resulted in 1,830 HHs, which represents the number of HHs confirmed to be registered under FEMA's Individual Assistance (IA) Program and in NCS on December 28, 2023. Based on the difference between the number of HHs reported and matched, 506 HHs are not reflecting as registered for IA and therefore are non-reimbursable for PA funding. These 506 non-reimbursable HHs are reflected as the

difference between the “Red Cross HHs Currently in NCS” and the “FEMA Registrations Matched to HHs Currently in NCS” in this table.

Categories	# Households (HHs)
Red Cross HHs Currently in NCS (Report Date: December 28, 2023)	2,336
FEMA Registrations Matched to HHs Currently in NCS (Match Date: January 03, 2024)	1,830
FEMA Registrations Reimbursable	1,112
FEMA Registrations Non-Reimbursable	718

With this letter, we are providing a list of the 1,112 Reimbursable HHs, based on the Red Cross/HI-EMA NCS Daily Data Report from December 28, 2023, which was matched by FEMA on January 3, 2024, and corresponds to the table above. These 1,112 HHs may continue to be reimbursable beyond the initial 6-month approved NCS period of February 10, 2024, should they meet the existing criteria as well as the additional criteria to be implemented as a condition of this approval and further detailed within this letter.

Additionally, please note the reported totals within the table above do not reflect those HHs currently sheltered within condominiums, a non-traditional NCS setting (712 HHs total). Condominiums are not a form of traditional sheltering and therefore are not reimbursable without receiving pre-approval from FEMA’s AAR. More information is included in a section below in this correspondence specifically addressing ‘Non-Traditional NCS Shelter Types’.

Reimbursement Criteria:

Pursuant to Section 312 of the Stafford Act, FEMA is prohibited from providing financial assistance that would duplicate funding provided by another program, insurance, or any other source for the same costs. Funding for NCS cannot duplicate funding by a non-federal agency, another federal agency or other FEMA programs and/or grants. It is the responsibility of the Applicant to transition disaster survivors out of PA-funded NCS to other forms of assistance, as the funding becomes available.

As defined in previous correspondence, FEMA will not reimburse Emergency NCS costs for FEMA registrants if any of the following apply:

- FEMA has not been able to match the HH to a FEMA-eligible registrant;
- The HH does not meet general FEMA IA eligibility requirements, including registrant’s occupancy in an affected primary residence, registrant’s verified identity, and non-withdrawal of their IA application;
- No member of the HH was registered with FEMA IA after the IA registration deadline of December 11, 2023, without sufficient justification for late registration;

- The registrant's pre-disaster primary residence is safe to occupy, and the registrant can return to their home;
- The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment, and has not demonstrated exhaustion of this benefit;
- Any member of the HH has utilized Section 425 Transportation Assistance for air travel through FEMA;
- The HH has obtained alternate temporary or long-term housing, to include placement through a voluntary agency;
- The registrant has previously vacated NCS and subsequently returned;
- The HH has been licensed into a Direct Housing unit, or has been offered a Direct Housing unit and has declined for an unacceptable reason, per IA guidelines; or
- The Direct Lease eligible HH fails to make reasonable efforts to move forward in the Direct Lease process, including required background checks.

The above list is not exhaustive and does not amend previous guidance. Based on concurrence from FEMA's AAR, this letter authorizes approval of your extension request to the extent that it adheres to the previously established NCS approval criteria, in addition to the conditions outlined below.

Feeding & Wrap-Around Services:

FEMA is aware of the challenges described in your request letter concerning the pre-disaster housing crisis in Maui County and how the impact of the devastation in Lahaina is further contributing to the extremely limited availability of affordable housing options. At the same time, the large-scale response and evacuations have concluded. Businesses and commerce have begun to resume outside of the immediate burn scar area. While there remains a long road to recovery, the immediate lifesaving and life sustaining operations have concluded. Grocery stores and businesses are now open and survivors no longer have limitation preventing them from accessing food sources.

Based on these circumstances, I agree that the lack of housing availability sufficiently justifies the need for continued NCS operations. However, feeding and other wrap-around services not included within a standard hotel booking will no longer be reimbursable through FEMA PA Funding for HHs in NCS beyond the currently approved February 10, 2024, NCS eligibility period.

Non-Traditional Shelter Types Remain Ineligible for PA Funding:

As explained within FEMA's December 31, 2023, letter, NCS costs incurred through the use of non-traditional shelter types, such as condominiums, apartments, villas, vacation rentals, etc. are non-reimbursable. Colloquially, these units have been described by HI-EMA and their Contractors as "hotels with kitchens", but the use of these types of dwellings for sheltering are considered non-traditional sheltering types and costs associated with these units are non-reimbursable. Moreover, the use of these types of lodging for sheltering survivors is impacting our ability to secure interim housing and long-term lease agreements to be secured through IA temporary direct housing assistance for households approved under the Individuals and Housing Program (IHP).

Aston & Outrigger Condominium Property Efforts:

FEMA's Direct Lease Contracting team has been in communication with Aston and Outrigger Property Managers, each of which are being utilized for NCS operations, as reported from the American Red Cross Daily NCS Status Updates and further confirmed within the HI-EMA Daily and Monthly Data Report.

FEMA is working with Aston to transition units within eight (8) properties. HI-EMA's December 28, 2023, Daily Data Report includes 344 HHs sheltered in Aston Properties. Of the 344 HHs, 214 HHs would otherwise be eligible for reimbursement if sheltered within approved traditional shelters (i.e. Hotels). Additionally, 126 of the 344 HHs are Direct Lease eligible.

FEMA is also working with Outrigger to transition units within five (5) properties. HI-EMA's December 28, 2023, Daily Data Report currently includes 199 HHs sheltered in Outrigger Properties. Of the 199 HHs, 108 HHs would otherwise be eligible for reimbursement if sheltered within approved traditional shelters (i.e. Hotels). Additionally, 68 of the 199 HHs are Direct Lease eligible.

Any sheltering costs invoiced for these condominium units are not reimbursable through the FEMA PA Program. We request the State's support to intervene in the use of these properties for NCS in an effort to advance FEMA's efforts, as described above, and to support transitioning these HHs into more sustainable, longer-term housing solutions at a lower cost to the taxpayers of the State of Hawaii.

HI-EMA/ARC Accepting new and returning HHs into NCS via "Exception Program":

We understand that HI-EMA has been accepting new or returning HHs into NCS on a case-by-case exception basis. Moving forward, no new HHs will be deemed reimbursable by FEMA PA. Potential FEMA reimbursement for NCS beyond the February 10, 2024, initial Region 9 Administrator's Approval Period will be limited to the attached list of (1,112 HHs) registrations, as reported in the weekly reimbursement report provided to HI-EMA and which corresponds to the table above.

In order for FEMA to consider any previously matched HHs as reimbursable beyond the initial 180-day time extension period of February 10, 2024, HI-EMA must resolve data matching issues and reasons for non-reimbursement listed in the Daily Data Reports and submit sufficient justification in a cumulative appeal list within the final Monthly Reporting Period submission on January 29, 2024.

FEMA and HI-EMA Partnership:

FEMA and HI-EMA have partnered closely to aid NCS HHs in progressing towards their interim and permanent housing solutions. FEMA has also worked diligently with State partners and their contractor to ensure that any HH that may potentially be reimbursable progresses as appropriate in their FEMA IA case, which at times has changed the HH's reimbursable status. However, many HHs are not reimbursable by nature of their individual situation. We encourage the State to focus its efforts on moving HHs onto the next phase of their recovery and FEMA is committed to assisting with that goal.

Please note that FEMA PA will only provide reimbursement for actual costs incurred for occupied hotel rooms.

If you have any questions or need any additional information, please contact Michael Gayrard, Public Assistance Branch Chief, at 510-627-7761 or Michael.Gayrard@FEMA.dhs.gov.

Sincerely,

Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

cc: Robert J. Fenton, Regional Administrator, FEMA Region 9
Heather Smith, Acting Director, Recovery Division, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Lorinda Wong-Lau, Resiliency Branch Director, HI Emergency Management Agency



FEMA

January 17, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of January 7, 2024, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received from HIEMA on January 7, 2024, and processed by FEMA (data matched) on January 10, 2024.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this letter and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheet data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 441 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

Based on the data provided via the State’s daily reporting, FEMA has found that there currently are HH being sheltered within a non-traditional NCS setting (712 HH).

Additionally, per FEMA’s December 31, 2023, correspondence, HHs which decline an offer of a Direct Housing unit and subsequently become ineligible for Direct Housing (12 HH), will become non-reimbursable 7 days after the date they are deemed ineligible. FEMA Individual Assistance is providing a listing of those HH via e-mail three times per week to regularly update HI-EMA of those P-3 HH and the specific date on which they declined direct housing assistance.

The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	2260
FEMA Registrations Matched to HH Currently in NCS	1819
FEMA Registrations Reimbursable	1097
FEMA Registrations Non-Reimbursable	722

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	0
No Contact or Withdrawn	22
Failed Occupancy Verification	23
Failed Identity Verification	7
Have Insurance AND Have Not Received Rental Assistance	233
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	96
No Habitability Repairs Required or Blank and No GIS Stamp	118
Travel Completed Utilizing Section 425 Transportation Assistance	3
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	12
P-3 - Declined Direct Housing Unit	9
Count of Registrations with Multiple Non-Reimbursable Reasons	199

FEMA reiterates its appreciation of Hawaii's continued assistance in providing the requested data regarding the individuals and households sheltered. If there are any households where non-reimbursement reasons have been addressed and updated information has been received, please provide the reconciled data within a single report including adequate justification within the seven (7) day grace period.

If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

Thomas J. Dargan
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Michael Plostock, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9

JOSH GREEN, M.D.
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MAJOR GENERAL KENNETH S. HARA
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January 17, 2024

Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Response to Non-Congregate Sheltering, Comprehensive Data Report letter of January 09, 2024,
FEMA-4724-DR-HI

Dear Mr. Dargan,

This letter serves as the Hawai'i Emergency Management Agency's (HIEMA) response to the Federal Emergency Management Agency's (FEMA) letter and Non-Congregate Sheltering (NCS) data report January 9, 2024 (letter date), and January 03, 2024 (data report date).

On September 8, 2023 (September 8 letter), FEMA approved Hawai'i's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. In the September 8 letter, FEMA was to provide HIEMA with weekly NCS eligibility reports, so that HIEMA can review current registrants' information and make eligibility corrections as necessary.

HIEMA received letters and data reports from FEMA specifically separating registrations by Non-reimbursable category on November 2, 2023, December 11, 2023, December 18, 2023, December 26, 2023, January 2, 2024, and January 9, 2024. Understandably, these letters and reports continued to change and evolve categorically as time went on. HIEMA, American Red Cross (ARC), and FEMA have worked collaboratively since early November 2023 to review the data provided by FEMA to ensure service eligibility for survivor families and reimbursability to the State of Hawaii. The results of the most recent reviews are summarized below and in the attached report.

HIEMA Response to Specific FEMA Categories:

No Contact or Withdrawn:

- Of **24** HHs in this category, HIEMA found **10** cases for which ARC took action and should now be reimbursable, pending applicant action. HIEMA found **14** duplicate registrations that should not be included in this category and should be removed from the Non-Reimbursable reports.

Failed Occupancy Verification:

- Of **21** HHs in this category, **3** cases are potentially State funded. **18** cases should be reimbursed by FEMA, including **13** households that are pending eligibility based on ARC or client action; **1** HH checked out of NCS on December 13, 2023, and should be removed from the NCS Eligibility Report; and **4** cases that are potential fraud and need further investigation by FEMA.

Failed Identity Verification:

- Of **7** HHs in this category, **4** cases are pending client action to remain eligible for NCS and **3** cases that need to be reviewed by FEMA, including **1** case that checked out of NCS on December 14, 2023, and should be removed from the NCS Eligibility Report.

Have Insurance AND Have Not Received Rental Assistance:

- Of **240** HHs in this category, HIEMA disagrees with **1** HH which needs to be reviewed by FEMA. **239** households are still pending review/resolution. HIEMA has requested assistance from the State Insurance Commission to obtain HH information regarding receipt of Additional Living Expenses (ALE) / Loss of Use (LOU) settlements.

Direct Housing Pre-Placement Interview P1 – Living in Damaged Dwelling or P2 - Found Another Housing Resource:

- Of **92** HHs, **56** cases should be reimbursable pending client action. **33** cases should be non-reimbursable, including **22** cases that checked out of NCS prior to December 20, 2023, and should be removed from the NCS Eligibility Report. **3** cases are still pending HIEMA review.

No Habitability Repairs Required or Blank and No GIS Stamp:

- Of **124** HHs, HIEMA contests FEMA's decision for **34** households that should be reimbursed by FEMA, including **17** cases that are pending HH action and **4** needing further review by FEMA. **3** HHs should be removed from NCS and **1** HH is State funded. **86** cases are pending review.

Travel Completed Utilizing Section 425 Transportation Assistance:

- Of **2** HHs, **1** HH checked out on November 29, 2023, and should be reimbursable through that date. The other **1** HH needs further review by both FEMA and ARC teams.

HIEMA would also like to reference the 425 Transportation Assistance 12/21/23 email originating from FEMA. In the follow-up reply, HIEMA referenced **12** total cases on the 425 list, including the above **2** cases which should have been corrected since the 12/21/23 correspondence. HIEMA respectfully requests FEMA take action to correct these errors.

Licensed into Direct Lease Unit under FEMA Direct Housing Assistance:

- Of **8** HHs, inconsistencies were found for **8** households which need to be reviewed for accuracy and should be reimbursed by FEMA.

Count of Registrations with Multiple Non-Reimbursable Reasons:

- Of **200** HHs, HIEMA agrees with **6** cases being State funded. **59** cases should be reimbursable pending HH action, **61** cases need to be reviewed by FEMA, but should be reviewed for accuracy and should be reimbursed by FEMA, including **1** case that was previously listed with a P2 code but was eligible for Direct Housing and **1** case that was checked out of NCS on December 2, 2023. **3** cases were never checked into NCS, and **71** cases are still pending NCS task force review.

Unmatched Households: 506

- **506** HHs are noted as not matched between FEMA and HIEMA’s contractor, ARC.

In the December 26, 2023, NCS Comprehensive Data report letter (for data as of December 21, 2023), FEMA reported 163 unmatched HHs. In the January 2, 2024 letter (for data as of December 27, 2023), FEMA reported 491 unmatched HHs. This unmatched figure increased to 506 in the January 9, 2024 letter (for data as of January 3, 2024). HIEMA facilitated several discussions with FEMA and ARC to identify the reasons for the “unmatched” HHs issue and to determine appropriate steps to resolve the issue. The discussions identified several challenges, most of which will be resolved by ARC modifying its reporting formats, and FEMA providing clarifying guidance to certain definitional differences between the two agencies’ policies. Both parties are working to resolve the “unmatched” HH issue and HIEMA will reconvene the group to review results within the next 10 days.

In addition, HIEMA identified that the NCS Data Report Letter dated January 9, 2024 listed **334** registration numbers with multiple non-reimbursable reasons, while the accompanying Cumulative Reimbursement Table dated January 3, 2024 only lists **200** registration numbers. HIEMA requests that FEMA work to reconcile this difference.

Households with Multiple and/or Conflicting Registration Information:

HIEMA identified a recurring issue with multiple registration numbers tied to one HH within the FEMA Reimbursable and FEMA Non-Reimbursable data reports. As of the January 3, 2024 Comprehensive Data Report, there were **99** lines (rows) containing either a duplicate applicant name or FEMA registration number:

- **1** HH is an exact duplicate
- **47** HHs occur twice with unique (differing) registration numbers
- **1** HH occurs three times with three unique (differing) registration numbers

Additionally, within the above-referenced **99** lines (rows):

- **3** HHs are listed under a FEMA registration number as Reimbursable and “still checked in,” but the other FEMA registration numbers tied to the same HHs are listed as Non-Reimbursable and “not checked in.”

- **16** HHs listed under a FEMA registration number as Non-Reimbursable and “still checked in,” but the other FEMA registration numbers tied to the same HHs are listed as Reimbursable and “not checked in.”

HIEMA respectfully asks that FEMA review the above comments and work in collaboration to resolve all discrepancies and issues outlined in this letter. HIEMA recognizes and appreciates FEMA’s ongoing efforts to assist HIEMA to support the survivors of this disaster. Should you have any questions, please contact Darrick Ching, HIEMA Individual Assistance, at (808) 798-1804.

Sincerely,



James DS. Barros
Administrator
Hawai‘i Emergency Management Agency

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



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January 31, 2024

Mr. Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
US Department of Homeland Security

Subject: FEMA Response to Hawaii Request for Time Extension through July 10, 2024
FEMA-4724-DR-HI

Dear Mr. Dargan:

Introduction

The State acknowledges and appreciates FEMA's response, in reference to FEMA-4724-DR-HI, to its request for a time extension on the Non-Congregate Sheltering Program. FEMA's response extends the Non-Congregate Sheltering program period through April 10, 2024. This program is essential for the recovery of eligible households impacted by the Maui Wildfires.

In response to certain provisions identified in the letter dated January 15, 2024, HI-EMA requests additional consideration from FEMA to the concerns outlined below.

Current NCS Population

Data Match Challenges

"In order for FEMA to consider any previously matched HHs as reimbursable beyond the initial 180-day time extension period of February 10, 2024, HI-EMA must resolve data matching issues and reasons for non-reimbursement listed in the Daily Data Reports and submit sufficient justification in a cumulative appeal list within the final Monthly Reporting Period submission on January 29, 2024."

FEMA has requested multiple forms of data match files from the State. FEMA initially outlined data reporting requirements within its September 8, 2023, authorization letter and expanded those requirements in the subsequent communication on October 20, 2023. To date, the State has submitted the required data to match records with the FEMA IHP program, including a FEMA Individual Assistance Registration ID, Head of Household names, number of individuals in the household, the address of the damaged dwelling. The State has consistently met these reporting

requirements. For each reporting request, FEMA has utilized the data in different applications, for example, for eligibility review for Individual Assistance funded programs and to review costs as reimbursable by Public Assistance funds. The State and FEMA share the responsibility to ensure the applicant data stored in the State's system of record matches the format within the FEMA system of record.

The State has led numerous efforts to resolve data matching challenges and has outlined corrective actions for FEMA and the American Red Cross to undertake. The State's contractor has adapted to a burdensome request for daily reporting and provided ad hoc reporting requests to assist with matching the applicant data stored in the FEMA system. It is the ultimate goal of all agencies to resolve these issues in the most expedient manner possible.

FEMA Registrations Reimbursable

In the January 15th letter, FEMA provided a list of 1,112 Reimbursable Households and stated that this universe of participants "may continue to be reimbursable beyond the initial 6-month approved NCS period of February 10, 2024, should they meet the existing criteria as well as the additional criteria to be implemented as a condition of this approval." While the State acknowledges FEMA's position that eligible applicants must be deemed eligible before February 10, 2024, the State requests formal clarification from FEMA that all households who have received NCS services are potentially eligible for FEMA Public Assistance reimbursement if the State demonstrates compliance with program policies.

The State has implemented a case review/triage process in collaboration with FEMA and the American Red Cross and all three parties have evolved the process to enhanced case reviews with the current population of disaster survivors deemed non-reimbursable by FEMA Public Assistance. In good faith, the State should have the opportunity to demonstrate that all 2,336 households are eligible for program services and reimbursable by FEMA Public Assistance through the end of the program.

The deadline imposed for the resolution of data matching issues does not serve the mission of FEMA, the Red Cross, or the State, agencies that are all currently working in partnership to resolve these issues. In addition to the data match effort, the letter identified 718 households that require case work by the data triage team and could require outreach to survivors by both the State and FEMA Programs. Therefore, we recommend that the data match efforts and case triage team reviews continue until the end of the program's period of performance to allow both programs sufficient time to demonstrate that the sheltering costs incurred are reimbursable by FEMA Public Assistance.

Reimbursement Criteria

"The registrant has previously vacated NCS and subsequently returned."

The requirement that an NCS participant must not have "previously vacated NCS and subsequently returned" is without precedent in any of the authorizations of the program, including the Public Assistance Program and Policy Guide (PAPPG) Version 4, subsequent memorandum issued on June 28, 2022, and the September 8, 2023 authorization for administration of the NCS mission in response to the Maui Wildfires.

Sheltering programs often allow for eligible applicants to participate, vacate under their own terms and return if the shelter period is still open and the applicant is still otherwise eligible. It is not survivor friendly to punish survivors who exercise self-discovered options such as moving in with family friends only to later find that the self-discovered option is not appropriate. If the need for shelter still exists, the applicant is still eligible for sheltering, then their subsequent stay in NCS should still be reimbursable by FEMA Public Assistance funds.

Further, the eligibility review process administered by the Red Cross is geared towards meeting a demonstrated unmet need. A survivor maintains a need for sheltering if they attempted to identify an interim resource and then were not successful in obtaining the resources and should remain eligible for NCS shelter until such a time that they successfully obtain interim or long-term housing. The state therefore requests that this restriction be lifted on those survivors coming back into the NCS program for services.

Feeding & Wrap-Around Services

FEMA stated that “feeding and other wrap-around services not included within a standard hotel booking will no longer be reimbursable through FEMA PA Funding for HHs in NCS beyond the currently approved February 10, 2024, NCS eligibility period.” The state intends to suspend FEMA funded feeding activities for applicants residing in Condominiums on February 9th, 2024, and begin to transition the remaining applicants off of the feeding services through end of February. The State must ensure appropriate communication is provided to applicants and is actively working to identify local and state resources to safeguard survivors against food insecurity as a result of the lapse in federally funded services. Given that many applicants are sheltered in accommodations that may not provide sufficient appliances to allow for food preparation and will rely on external sources to feed their families. The State respectfully requests reimbursement support through the end of February.

Non-Traditional Shelter Types: Condominiums

In FEMA’s response to the State’s request for a time extension on January 15th, FEMA stated that “*Condominiums are not a form of traditional sheltering and therefore are not reimbursable without receiving pre-approval from FEMA’s ARR.*” The American Red Cross, on behalf of the State, requested guidance and approval from FEMA on August 19, 2023, regarding the use of condominiums. The State of Hawaii requested and received approval from FEMA via email to use condominiums and time shares for NCS activities on August 19, 2023.

As outlined in the State’s letter to FEMA on January 12th, a lack of available sheltering units for NCS activities caused the State to request and receive prior approval from FEMA for non-traditional shelter types. As of January 31, 2024, the State has not received a formal response to the letter submitted to FEMA to formally approve NCS sheltering in Condominiums.

The State has also worked collaboratively with FEMA to move households to shelter in Condominiums, and subsequently worked to move households away from condominium units to support FEMA’s acquisition of units for Direct Lease. As of January 31st, the FEMA Direct Lease program has reported that they have secured a sufficient number of units to meet their program needs. While the lack of availability of housing options in Maui caused both the Direct Lease program and

Mr. Thomas J. Dargan

January 31, 2024

Page | 4

the NCS sheltering mission to pursue the same assets, this circumstance should not impact whether the costs incurred to meet survivors' needs are the reimbursable by FEMA Public Assistance.

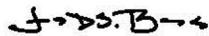
HI-EMA/ARC Accepting new and returning HHs into NCS via “Exception Program”

The State acknowledges that no new households deemed eligible for NCS after February 10, 2024 will be reimbursable by FEMA PA funds.

The State has expressed concerns and objections to the limited list of 1,112 registrations in the Current NCS Population section above and reiterates that the State should maintain the opportunity to demonstrate eligibility of the full universe of NCS recipients for the full program period of performance. Similarly, the State outlined significant concern with the January 29, 2024 deadline imposed in the Current NCS Population section of this letter and reiterates that the deadline proposed does not support the program mission objectives shared between FEMA, State, and American Red Cross.

We appreciate FEMA's prompt attention to this matter and continued collaboration as we work to recover from this disaster. If you have any questions or require additional information, please contact Darrick Ching, DR-4724 Joint Housing Task Force, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES DS. BARROS

Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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February 5, 2024

Mr. Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
US Department of Homeland Security

Dear Mr. Dargan:

January 2024 Monthly Non-Congregate Sheltering & Hotel Market Survey Report
Hawai'i Wildfires, FEMA-4724-DR-HI

Please find the attached January 2024 monthly Non-Congregate Sheltering (NCS) report and Hotel Market Survey Report. The password for the NCS report will be sent via email later. We have summarized our findings below:

- **Households in NCS**
 - On Jan. 29, 2024, there were a total of 2,164 households (5,193 people) at 21 sites.
 - Of this total, 67 households were in the Red Cross funded category.
 - On Jan. 29, 2024, 5,255 meals were served to NCS households for a cumulative total of 1,176,430.
- **Market Survey (January 2024) provided by American Red Cross (ARC)**
 - 26 Hotel/Condo sites surveyed
 - Average rate range: \$354 - \$1,035
 - Hotel/Condo locations:
 - 24 in West Maui (Lahaina, Kaanapali, Kapalua)
 - 2 in Central Maui (Kahului)
- **Condominiums used for NCS**
 - Per letter to the Hawai'i Emergency Management Agency (HI-EMA) dated 12/31/2023, FEMA reiterated that condominiums are considered "non-traditional" NCS settings and therefore require pre-approval from FEMA HQ.

- **Habitability Status/Actions**

- HI-EMA via the NCS Transition Task Force continues to review habitability status of NCS households/homes and is working with Maui County to determine whether homes are habitable.
- NCS Task Force worked to transition NCS households back to their homes in Zone 09K.
- Habitability evaluations of other homes is in process, and survivors will be notified when their homes are deemed habitable.

In reference to our letter dated January 31, 2024 “Subject: FEMA Response to Hawaii Request for Time Extension through July 10, 2024,” we would like to point out the following:

- **Data match challenges** - The State has led numerous efforts to resolve data matching challenges between FEMA’s and the American Red Cross’ NCS household reports. We deem the data match issues to be a shared responsibility and we re-iterate the State should maintain the opportunity to demonstrate eligibility of the full universe of NCS recipients for the full program period of performance.
- **FEMA Registrations Reimbursable** - In addition to the data match effort, the letter identified 718 households that require case work by the data triage team and could require outreach to survivors by both the State and FEMA Programs. Therefore, we recommend that the data match efforts and case triage team reviews continue until the end of the program’s period of performance to allow both programs sufficient time to demonstrate that the sheltering costs incurred are reimbursable by FEMA Public Assistance.
- **Non-Traditional Shelter Types: Condominiums** - The State of Hawaii requested and received approval from the then-Acting FEMA FCO via email to use condominiums and time shares for NCS activities on August 19, 2023.

We appreciate FEMA's continued collaboration as we work to recover from this disaster. If you have any questions or require additional information, please contact Peter Kawamura, DR-4724, at (808) 983-2546 or Peter.Kawamura@hawaii.gov .

Sincerely,



James DS. Barros
Administrator of Emergency Management

Attachments: 462-24C Hotel Detail_2.5.24
Monthly FEMA HI NCS Report 1_30_2024

JOSH GREEN, M.D.
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February 7, 2024

Thomas J. Dargan, Deputy Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Response to Non-Congregate Sheltering, Comprehensive Data Reports Current as of January 15, 2024 and processed by FEMA on January 23, 2024, FEMA-4724-DR-HI

Dear Mr. Dargan,

This letter serves as the Hawai'i Emergency Management Agency's (HIEMA) response to the Federal Emergency Management Agency's (FEMA) Non-Congregate Sheltering (NCS) data report received via e-mail on January 29, 2024.

On September 8, 2023 (September 8 letter), FEMA approved Hawai'i's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. In the September 8 letter, FEMA was to provide HIEMA with weekly NCS eligibility reports, so that HIEMA can review current registrants' information and make eligibility corrections as necessary. On January 15, 2024, FEMA approved the state's request for extension of NCS to April 10, 2024.

Through the NCS task force, HIEMA, American Red Cross (ARC), and FEMA members have reviewed the data provided by FEMA. The results of the most recent reviews are summarized below and in the attached report.

Response to Specific Categories as Outlined by FEMA's above-mentioned data report are as follows:

No Contact or Withdrawn: 21 HHs

- 17 HHs should be FEMA reimbursable
- 4 HHs ARC has taken action and/or pending applicant action

Failed Occupancy Verification: 24 HHs

- 3 HHs that should be FEMA reimbursable
- 12 HHs that ARC has taken action and/or pending applicant action
- 9 HHs that should be State funded

Failed Identity Verification: 6 HHs

- 4 HHs that should be FEMA reimbursable
- 1 HH that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded

Have Insurance AND Have Not Received Rental Assistance: 223 HHs

- 39 HHs that should be FEMA reimbursable
- 178 HHs that ARC has taken action and/or pending applicant action
- 6 HHs that should be State funded

Direct Housing Pre-Placement Interview P1 – Living in Damaged Dwelling or P2 - Found Another Housing Resource: 70 HHs

- 35 HHs that should be FEMA reimbursable
- 34 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded

No Habitability Repairs Required or Blank and No GIS Stamp: 101 HHs

- 61 HHs that should be FEMA reimbursable
- 34 HHs that ARC has taken action and/or pending applicant action
- 6 HHs that should be State funded

Travel Completed Utilizing Section 425 Transportation Assistance: 2 HHs

- 2 HHs that should be FEMA reimbursable

Licensed into Direct Lease Unit under FEMA Direct Housing Assistance: 29 HHs

- 11 HHs that should be FEMA reimbursable
- 18 HHs that ARC has taken action and/or pending applicant action

P3 – Declined DH Unit: 17 HHs

- 3 HHs that should be FEMA reimbursable
- 13 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded

Count of Registrations with Multiple Non-Reimbursable Reasons: 179 HHs

- 73 HHs that should be FEMA reimbursable
- 95 HHs that ARC has taken action and/or pending applicant action
- 11 HHs that should be State funded

Unmatched Households:

- **380** HHs are not matched between FEMA's data reports and ARC's data reports (reported on behalf of the state).

The State has facilitated numerous efforts to resolve data matching challenges between FEMA's and the American Red Cross' NCS household reports. We deem the data match issues to be a shared responsibility and we re-iterate the State should maintain the opportunity to demonstrate eligibility of the full universe of NCS recipients for the full program period of performance.

The state recognizes and appreciates FEMA's ongoing efforts to assist and support the survivors of this disaster. Should you have any questions, please contact Darrick Ching, HI-EMA, at (808) 798-1804.

Sincerely,



James DS. Barros
Administrator
Hawai'i Emergency Management Agency

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
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HONOLULU, HAWAII 96816-4420

February 9, 2024

Mr. Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
US Department of Homeland Security

Subject: Setting a threshold for Additional Living Expenses (ALE) benefits in duplication of benefits determination

Dear Mr. Dargan:

In the State of Hawaii's ongoing efforts to provide efficient and effective assistance to residents impacted by the Maui Wildfires, the State is proposing a critical update to the methodology for considering Additional Living Expenses (ALE) received by eligible individuals or households. We urge FEMA to carefully consider and approve this proposed adjustment to better serve our affected communities.

The State recommends that the Non-Congregate Sheltering (NCS) program implement a minimum threshold of \$40,000 in ALE benefits. This threshold would serve as a crucial marker, below which there would be an assumption of no duplication of benefits for FEMA assistance. Our rationale for this threshold is grounded in the pressing needs and financial realities faced by wildfire survivors in an area with limited housing units to accommodate the need created by the event.

- The State currently estimates that the cost of sheltering a family impacted by the Maui Wildfires is approximately \$1,000/day, which includes sheltering and necessary wrap-around services. This cost, borne out across 6-months, which is the length of time those currently in the NCS program have required assistance, is nearing \$180,000 per household. The proposed threshold of \$40,000 would have covered approximately 40 days of sheltering.
- FEMA's direct lease program has rented units at 366% of the Fair Market Rent (FMR). For FY2024, 100% FMR for Maui County is \$3,237 for a four-bedroom. At 366% FMR, the rate reaches \$11,847 for a four-bedroom. (Shelter managers have reported an estimated household size of 3.4 individuals.) For a family requiring four bedrooms, ALE/LOU coverage of \$40,000 would cover their sheltering need for approximately three months only. As FEMA has faced difficulty in locating units at or near the FMR, the State is concerned about the lack of units available at FMR for survivor households with coverage below \$40,000.

Mr. Thomas J. Dargan

February 5, 2024

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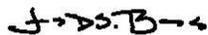
By implementing this proposed threshold, the burden of proof would be alleviated from wildfire survivors, who currently face the task of demonstrating the exhaustion of all ALE assistance. Instead, it would be assumed that if a household received up to the identified threshold amount, their ALE benefits have been fully depleted, rendering them in need of and eligible for FEMA assistance. As FEMA has implemented in their rental assistance program in prior disasters, the State expects that these households will need the ALE to at the end of the sheltering period for any gap in housing resources as households transition from sheltering to longer term recovery. Because the ALE will not cover the same services for the same time period, this action will not result in a duplication of benefits.

FEMA has found 223 households to be ineligible only due to insurance to receive assistance due to the receipt of ALE. Of these households, the State estimates that approximately 40.81% have received \$40,000 or less in ALE payments from their insurance. The state requests establishment of this threshold policy to be retroactive to the beginning of NCS, so all impacted applicants may be reconsidered for eligibility for FEMA reimbursement.

In light of these justifications and the urgent needs of our communities, the State requests FEMA's approval of this policy update to be implemented within the current NCS program.

If you have any questions or require additional information, please contact Darrick Ching, DR-4724 NCS Task Force Lead, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES D.S. BARROS

Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
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Feb 15, 2024

Thomas J. Dargan, Deputy Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Response to Non-Congregate Sheltering, Comprehensive Data Report Current as of February 07, 2024

Dear Mr. Dargan,

This letter serves as the Hawai'i Emergency Management Agency's (HIEMA) response to the Federal Emergency Management Agency's (FEMA) Non-Congregate Sheltering (NCS) data report from February 7, 2024.

On September 8, 2023 (September 8 letter), FEMA approved Hawai'i's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. In the September 8 letter, FEMA was to provide HIEMA with weekly NCS eligibility reports, so that HIEMA can review current registrants' information and make eligibility corrections as necessary. On January 15, 2024, FEMA approved the state's request for extension of NCS to April 10, 2024.

Through the NCS task force, HIEMA, American Red Cross (ARC), and FEMA members have reviewed the data provided by FEMA. The results of the most recent reviews are summarized below and in the attached report.

Response to Specific Categories as Outlined by FEMA's above-mentioned data report are as follows:

No Contact or Withdrawn: 31 HHs

- 22 HHs should be FEMA reimbursable
- 6 HHs ARC has taken action and/or pending applicant action
- 3 HHs that should be State funded

Failed Occupancy Verification: 24 HHs

- 2 HHs that should be FEMA reimbursable
- 12 HHs that ARC has taken action and/or pending applicant action
- 5 HHs that should be State funded
- 5 HHs that should be reviewed for potential fraud, waste or abuse of benefits.

Failed Identity Verification: 8 HHs

- 4 HHs that should be FEMA reimbursable
- 2 HH that ARC has taken action and/or pending applicant action
- 2 HH that should be State funded

Have Insurance AND Have Not Received Rental Assistance: 257 HHS

- 64 HHs that should be FEMA reimbursable
- 143 HHs that ARC has taken action and/or pending applicant action
- 49 HHs that should be State funded
- 1 HH that should be reviewed for potential fraud, waste or abuse of benefits.

Direct Housing Pre-Placement Interview P1 – Living in Damaged Dwelling or P2 - Found Another Housing Resource: 78 HHs

- 29 HHs that should be FEMA reimbursable
- 35 HHs that ARC has taken action and/or pending applicant action
- 13 HHs that should be State funded
- 1 HH that should be reviewed for potential fraud, waste or abuse of benefits.

No Habitability Repairs Required or Blank and No GIS Stamp: 87 HHs

- 16 HHs that should be FEMA reimbursable
- 43 HHs that ARC has taken action and/or pending applicant action
- 19 HHs that should be State funded
- 9 HHs are still pending NCS Taskforce review.

Travel Completed Utilizing Section 425 Transportation Assistance: 2 HHs

- 2 HHs that should be FEMA reimbursable

Licensed into Direct Lease Unit under FEMA Direct Housing Assistance: 50 HHs

- 49 HHs that should be FEMA reimbursable
- 1 HH that ARC has taken action and/or pending applicant action

P3 – Declined DH Unit: 10 HHs

- 2 HHs that should be FEMA reimbursable
- 8 HHs that ARC has taken action and/or pending applicant action

Count of Registrations with Multiple Non-Reimbursable Reasons: 196 HHs

- 49 HHs that should be FEMA reimbursable
- 85 HHs that ARC has taken action and/or pending applicant action
- 11 HHs that should be State funded
- 51 HHs are still pending NCS Taskforce review.

Unmatched Households:

- 161 HHs are not matched between FEMA's data reports and ARC's data reports (reported on behalf of the state).

The State has facilitated numerous efforts to resolve data matching challenges between FEMA's and the American Red Cross' NCS household reports. We deem the data match issues to be a shared responsibility and we re-iterate the State should maintain the opportunity to demonstrate eligibility of the full universe of NCS recipients for the full program period of performance.

The state recognizes and appreciates FEMA's ongoing efforts to assist and support the survivors of this disaster. Should you have any questions, please contact Darrick Ching, HI-EMA, at (808) 798-1804.

Sincerely,



James DS. Barros
Administrator
Hawai'i Emergency Management Agency



FEMA

February 20, 2024

MEMORANDUM FOR: Robert J. Fenton
Regional Administrator
Region IX

ATTN: Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

**WILLIAM C
HAGMAIER** Digitally signed by
WILLIAM C HAGMAIER
Date: 2024.02.20
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SUBJECT: Non-Congregate Sheltering Waiver Request, Hawaii Wildfires,
FEMA-4724-DR-HI

This is in response to the Federal Coordinating Officer (FCO) Thomas Dargan's memo titled: "FEMA-4724-DR-HI Non-Congregate Sheltering Request for Use of Condominiums and Apartments for NCS Activities" on behalf of the State of Hawaii (State) requesting use of condominiums and apartments for the provision of non-congregate sheltering (NCS) for DR-4724-HI, declared on August 10, 2023.

According to the [Emergency Non-Congregate Sheltering \(Emergency NCS\) memo](#), issued June 28, 2022, only traditional methods of providing NCS are eligible without explicit prior approval from Assistant Administrator, Recovery Directorate (AARD) and the State being provided disaster specific guidance (DSG) for use of a non-traditional method of providing NCS. The Emergency NCS memo describes: "NCS activities in traditional settings, i.e., hotels/motels, dormitories, retreat camps." Therefore, using condominiums/apartments to provide NCS would be considered a non-traditional method.

The State indicates in its request to the FCO that using condominiums/apartments was and continues to be essential due to insufficient vacant hotel/motel rooms and is more cost effective than using hotel/motel rooms based on an average per night fee. The State further asserts that in an email from the FCO it was led to believe use of condominiums/apartments was eligible for PA supported NCS. The Regional Administrator (RA) has also concurred with the State's request.

Since the State's request is seeking consideration for the use of condominiums/apartments as eligible for PA supported NCS retroactive to August 19, 2023, it is not possible to provide the prior approval

for non-tradition methods, this memo provides a waiver of that requirement as stated in the Emergency NCS memo: “FEMA will waive the requirement in the PAPPG for Recipients/Applicants to obtain pre-approval before conducting NCS activities in traditional settings, i.e., hotels/motels, dormitories, retreat camps.” Further, as the State has placed survivors into condominiums/apartments as it placed survivors into vacant hotel/motel rooms, this memo waives the requirement for a separate DSG to be developed and issued, with the following caveats:

- Within the context of this memo and the above-referenced waivers, the State must account for its use of condominiums/apartments on a per- night cost basis, to demonstrate cost reasonableness.
- FEMA will not reimburse the cost for any lease or rental agreements that exceed the period of time for which the State has been approved to conduct PA-supported NCS activities.
 - In the event a longer-term agreement is necessary, such agreements must include options to terminate for convenience in any lease agreements, so that the State does not incur costs for the use of condominiums/apartments for NCS beyond the FEMA’s timelines for NCS eligibility.

Should the State consider some other form of sheltering beyond those identified as traditional methods in the Emergency NCS Memo or condominiums/apartments addressed here, the State will seek prior approval before employing those other non-traditional NCS methods.

Considering the devastating impacts of the wildfires in Hawaii and the clear communication in the RA’s support for the State’s request, I approve the State’s request to use condominiums/apartments for the provision of PA- supported NCS and considers this memo to constitute DSG to the State. This approval is retroactive to August 19, 2023. The approval extends through 45 days after the end of the 6-month initial Period of Performance, through April 4, 2024, for the purposes of transitioning survivors out of condominiums/apartments. During this time no new survivors placed into condominiums/apartments will be eligible for reimbursement, and the Applicant should revert all eligible NCS households to eligible NCS hotels beyond this date. This period is, of course, also contingent on Hawaii requesting and receiving approval for overall NCS eligibility through this date.

If you have additional questions, please have a member of your staff contact Robert M. Pesapane, Public Assistance Division Director at Robert.Pesapane@fema.gov.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
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STATE OF HAWAII
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February 27, 2024

Mr. Thomas J. Dargan
Federal Coordinating Officer, FEMA-DR-4724-HI
Federal Emergency Management Agency
US Department of Homeland Security

Subject: Further Consideration for Additional Living Expense/Loss of Use (ALE/LOU)
Insurance Coverage for Eligible Applicants to Alleviate Duplication of Benefits

Dear Mr. Dargan:

The State of Hawaii appreciates the support and partnership FEMA has provided to our state and its residents, especially during these challenging times following the Maui Wildfires. In an effort to advance our joint mission of assisting impacted residents, the State has identified a few areas where we believe FEMA's policy could be adjusted to better serve some of our applicants who are currently without a housing solution.

In FEMA's most recent data report on reimbursable applicants shared with the state on February 24th, 2024, 357 cases were identified as non-reimbursable due to potential ALE/LOU. According to FEMA IA staff, this universe of applicants was identified based on a question on the initial registration but has not necessarily been verified by the FEMA processing team. The state has identified a few sub-populations and a potential for remedy outlined below:

- **Scenario 1: Households who have not provided any insurance documentation.** For approximately 160 households, neither FEMA nor the State has verified that these households have access to insurance coverage. The State is working closely with FEMA on the NCS Task Force to collect additional documentation from households in this situation. Applicants could have insurance coverage that does not include ALE/LOU or could have no insurance coverage at all. Until coverage policies have been collected and reviewed, applicants in this situation should not be considered non-reimbursable by Public Assistance funds as the services provided through the NCS program have been direct sheltering assistance.
- **Scenario 2: Households could be eligible for direct lease.** As explained below, applicants could be eligible for the direct lease program and pay their insurance coverage to FEMA to remedy the concern regarding duplicative benefits. The State requests that FEMA reference

their own collection of insurance funds for Direct Lease as confirmation that there was not a duplicative use of funds for the duration of the NCS program.

- **Scenario 3: Households with confirmed ALE/LOU who stayed in NCS due to lack of available housing stock.** Households with confirmed ALE/LOU insurance may not have been able to identify a unit given the acknowledged shortage of available short-term rental units in Maui following the event. Given that the financial award from insurance was not able to meet the survivors need, the mere potential for coverage should not be considered a sole justification for lack of reimbursement through FEMA Public Assistance. Due to this very real barrier, an impacted household may have been unable to use ALE funds for housing that was affordable and met their sheltering need. Further, an applicant could instead use these funds for other necessities, minimizing or eliminating the issue of duplication of benefits for immediate sheltering assistance. While FEMA has recognized the lack of available units, this issue needs to be addressed in the policy regarding potential insurance benefits.

In the scenario where a household has received ALE/LOU and has not exhausted this benefit on other necessary expenses, and the only mechanism they have for obtaining housing assistance is through the FEMA direct lease program, that ALE/LOU could be received by FEMA for direct lease. These households are FEMA eligible, and ultimately receive FEMA assistance through the direct lease program and should therefore also be considered eligible under the Non-Congregate Sheltering (NCS) program. This would ensure that the funds are used effectively and efficiently to provide housing solutions for our residents. Furthermore, we believe that FEMA should not withhold reimbursement from the state if FEMA ends up collecting the insurance money themselves as there is no mechanism for the State to pursue recoupment of funding from applicants. The State requests that either 1) FEMA relinquish the collected insurance settlements directly to the State to cover costs of the NCS Program or 2) that FEMA not consider the benefit exhausted during Direct Lease as a barrier to reimbursement through Public Assistance. This would ensure that the state has the necessary funds to continue providing essential services to our residents.

Therefore, the State is requesting that any households that are providing ALE/LOU insurance coverage to FEMA under the direct lease program maintain their FEMA eligibility for NCS. If funds are provided to FEMA for direct lease, they do not present a duplication of benefits for the NCS program, as they will be utilized and exhausted on their ongoing housing needs.

Finally, the State requests clarification on the method that FEMA will utilize to calculate the reimbursement amount for the NCS program and requests that the FEMA confirm that the State's on-going efforts to demonstrate that applicants are reimbursable for Public Assistance will result in reimbursement starting the date which the applicant entered the program. The state will seek reimbursement from FEMA on the costs incurred for NCS minus funding from other sources, including any funding collected from applicants. Accordingly, the state respectfully requests that any suspected eligibility concerns are restricted to a period of time and specific dollar amount in question and not for the entire costs incurred in providing services to a survivor.

We look forward to discussing these points further and working together to improve the support provided to our residents. Thank you for your time and consideration.

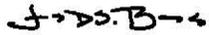
Mr. Thomas J. Dargan

February 27, 2024

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If you have any questions or require additional information, please contact Darrick Ching, DR-4724 Joint Housing Task Force, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,

Handwritten signature of James D.S. Barros in black ink.

JAMES DS. BARROS

Governor's Authorized Representative



FEMA

March 1, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of February 25, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received from HIEMA on February 25, 2024, and processed by FEMA (data matched) on February 28, 2024.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to inform and assist the State, prior to seeking reimbursement, of HH's eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this letter and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheet data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 103 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Pending/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	1717
FEMA Registrations Matched to HH Currently in NCS	1614
FEMA Registrations Reimbursable	1059
FEMA Registrations Non-Reimbursable	555

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	0
No Contact or Withdrawn	21
Failed Occupancy Verification	9
Failed Identity Verification	3
Have Insurance AND Have Not Received Rental Assistance	220
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	46
No Habitability Repairs Required or Blank and No GIS Stamp	68
Travel Completed Utilizing Section 425 Transportation Assistance	2
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	38
P-3 - Declined Direct Housing Unit	2
Count of Registrations with Multiple Non-Reimbursable Reasons	146

FEMA reiterates its appreciation of Hawaii's continued assistance in providing the requested data regarding the individuals and households sheltered. If you have any questions regarding this matter, please contact Michael Gayrard, Public Assistance Field Branch Chief, at (510) 504-8045.

Sincerely,

THOMAS J
DARGAN

Digitally signed by
THOMAS J DARGAN
Date: 2024.03.01
12:20:37 -10'00'

Thomas J. Dargan
Deputy Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Michael Plostock, Acting Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
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March 1, 2024

Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: FEMA-4724-DR-HI, Extension of Non-Congregate Sheltering (NCS)

On January 15, 2024, Federal Coordinating Office (FCO) Thomas J. Dargan, on behalf of the Federal Management Emergency Agency (FEMA), and with concurrence from the Assistant Administrator of the Recovery (AAR) authorized a time extension of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. The extension for 60-days made the end date April 10, 2024.

HI-EMA continues to oversee NCS in accordance with FEMA's Public Assistance Program and Policy Guide (PAPPG) Version 4 and the policy described in the FEMA's "Emergency Non-Congregate Sheltering" memorandum, dated June 28, 2022.

The "Emergency Non-Congregate Sheltering" memorandum indicates that Regional Administrators may provide time extensions up to six (6) months from the declaration date. The memorandum further states that time extensions beyond six (6) months must be approved by the Assistant Administrator for Recovery.

The Declaration Date for DR-4724-HI was August 10, 2023. NCS is currently authorized to operate until April 10, 2024. HI-EMA is requesting that FEMA approve an extension for NCS to August 10, 2024.

HI-EMA has evaluated conditions that make this extension critical, including the following circumstances:

1. *Interim Housing Options* - The State of Hawaii expects that Interim Housing through FEMA's Group Site will be ready to transition households no earlier than August 1, 2024. The State of Hawai'i's Group Site is expected to be completed in a similar timeframe. By extending NCS to August 10, 2024, the State will have the much-needed time to transition households from

NCS to an interim housing option. HI-EMA has been working closely with FEMA to work towards this transition.

2. *Direct Housing* – Of the NCS population, FEMA has identified 715 households for Direct Housing. Of these households, 317 have been leased-in to date. This extension will allow NCS households time to transition into FEMA and the State of Hawai'i's interim housing solutions.
3. *Housing Shortage* – The State and Maui county are working in collaboration with FEMA to identify viable intermediate housing solutions for applicants in NCS, including new construction.
4. *Debris Removal and Utility Restoration* – Debris removal is ongoing in the impacted area, which will enable some survivors to return home. The State continues to work with FEMA's Geographic Information Systems (GIS) team to determine when homes will become available for those who are able to return to their properties based on the availability of necessary utilities (potable water, sewerage, and electric utilities). The extension will allow for additional time for debris removal and utility restoration, which will be critical in returning survivors to their homes.

As stated in FEMA's January 15th letter to HI-EMA, "FEMA is aware of the challenges described in your request letter concerning the pre-disaster housing crisis in Maui County and how the impact of the devastation in Lahaina is further contributing to the extremely limited availability of affordable housing options." HI-EMA continues to observe the same challenges in the limited availability of housing options for survivors that was acknowledged by FEMA in January.

The State of Hawaii will continue to work with the survivors and expedite the finding housing options whenever available. Interim Housing and Direct Lease will contribute significantly to filling this gap in the next few months. HI-EMA is requesting that FEMA approve an extension NCS to August 10, 2024 to address this need.

The State of Hawaii appreciates FEMA's continued partnership and commitment to the recovery of the survivors. Thank you for your consideration of this request.

If you have any questions or require additional information, please contact Darrick Ching, DR-4724 Joint Housing Task Force, at (808) 798-1804, or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

March 08, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

RE: Response to Non-Congregate Sheltering, Comprehensive Data Report Current as of March 1, 2024, FEMA-4724-DR-HI

Dear Mr. Dargan,

This letter serves as the Hawai'i Emergency Management Agency's (HIEMA) response to the Federal Emergency Management Agency's (FEMA) Non-Congregate Sheltering (NCS) data report as of February 28, 2024 and received by HIEMA on March 02, 2024.

On September 8, 2023, FEMA approved Hawai'i's notice of NCS, within counties designated under DR-4724-HI. In the September 8, 2023 letter, FEMA was instructed to provide HIEMA with weekly NCS eligibility reports, so that HIEMA can review current registrants' information and make eligibility corrections as necessary. On January 15, 2024, FEMA approved the state's request for extension of NCS to April 10, 2024.

Through the NCS Transition Task Force, HIEMA, American Red Cross (ARC), and FEMA members have reviewed the data provided by FEMA. The results of the most recent reviews are summarized below and in the attached report.

To expedite review, 82 of the 209 have been identified as a priority for FEMA review because they should be relatively quick to resolve upon re-review of the data within the FEMA data system. Those 82 cases have been attached on a tab titled "Priority 1 Pending FEMA Review". All 209 cases that the Data Triage team has identified as reimbursable pending FEMA's review of the data are available on the second tab titled "Pending FEMA Review (Full List)"

Response to Specific Categories as Outlined by FEMA's above-mentioned data report are as follows:

No Contact or Withdrawn: 21 HHs

- 21 HHs should be FEMA reimbursable

Failed Occupancy Verification: 9 HHs

- 6 HHs that should be FEMA reimbursable
- 2 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded

Failed Identity Verification: 3 HHs

- 2 HH that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded

Have Insurance AND Have Not Received Rental Assistance: 220 HHs

- 58 HHs that should be FEMA reimbursable
- 161 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be reviewed for potential fraud, waste or abuse of benefits

Direct Housing Pre-Placement Interview P1 – Living in Damaged Dwelling or P2 - Found Another Housing Resource: 46 HHs

- 25 HHs that should be FEMA reimbursable
- 16 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded
- 4 HHs that should be reviewed for potential fraud, waste or abuse of benefits

No Habitability Repairs Required or Blank and No GIS Stamp: 68 HHs

- 32 HHs that should be FEMA reimbursable
- 34 HHs that ARC has taken action and/or pending applicant action
- 1 HH that should be State funded
- 1 HH that should be reviewed for potential fraud, waste or abuse of benefits

Travel Completed Utilizing Section 425 Transportation Assistance: 2 HHs

- 1 HH that should be FEMA reimbursable
- 1 HH that ARC has taken action and/or pending applicant action

Licensed into Direct Lease Unit under FEMA Direct Housing Assistance: 38 HHs

- 38 HHs that should be FEMA reimbursable

P3 – Declined DH Unit: 2 HHs

- 2 HHs that ARC has taken action and/or pending applicant action.

Count of Registrations with Multiple Non-Reimbursable Reasons: 146 HHs

- 26 HHs that should be FEMA reimbursable
- 115 HHs that ARC has taken action and/or pending applicant action
- 5 HHs that should be reviewed for potential fraud, waste or abuse of benefits

Unmatched Households:

- **103** HHs are not matched between FEMA's data reports and ARC's data reports.

The State has facilitated numerous efforts to resolve data matching challenges between FEMA's and the American Red Cross' NCS household reports. We deem the data match issues to be a shared responsibility and we re-iterate the State should maintain the opportunity to demonstrate eligibility of the full universe of NCS recipients for the full program period of performance.

The state recognizes and appreciates FEMA's ongoing efforts to assist and support the survivors of this disaster. Should you have any questions, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,



James DS. Barros
Administrator
Hawai'i Emergency Management Agency

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
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4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

March 13, 2024

Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

Regarding Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI

Dear Mr. Dargan,

On March 13, 2024, the County of Maui sent the State of Hawaii the Determination of Uninhabitable Residences due to the Maui Wildfires, FEMA-4724-DR-HI. While repairs are underway, the County has determined that many homes remain uninhabitable or restricted from access by previous residents.

All residential addresses attached to this letter are not habitable yet due to these on-going restoration efforts. Most of these uninhabitable residences are within an area that is designated for restricted local access only from 8 AM to 4 PM daily for area residents with a vehicle pass or ID to perform repairs or debris removal on their homes. Please review the attached letter "Determination of Uninhabitable Residences Wildfires, FEMA-4724-DR-HI" from the County of Maui for the specific areas with limited access. Many residences also face other challenges, such as a lack of clean water or sewer services. These residences will remain uninhabitable until access restrictions are lifted. The county does not have a timeline to lift restrictions identified yet.

The County of Maui classifies these specific residences as temporarily uninhabitable until health and safety issues are addressed and mitigated. FEMA's standard of habitability is based on the definitions of "safe," "sanitary," and "functional" in accordance with federal regulations (see 44 C.F.R. 206.117(2)(d)). Distillation of regulations and policy considers:

- Access to essential utilities, including:
 - Power
 - Gas
 - Water (pre-disaster municipal or well)
 - Sewer/water treatment (either pre-disaster municipal or septic)
- Physical road access

February 27, 2024

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- Structural integrity of the primary dwelling

These same considerations have been factored into the determination by Maui County. Many of these uninhabitable residences have been deemed not reimbursable by FEMA due to a belief that the home is currently habitable. Considering the information provided by the County of Maui on March 13, the State requests that FEMA acknowledge that households on the attached list have been determined to be unsafe to occupy due to the event by the local jurisdiction and reimburse the State for their stay in an NCS shelter accordingly.

For additional details or inquiries, please reach out to Darrick Ching, NCS Task Force Lead, at 808-798-1804 or darrick.j.m.ching@hawaii.gov.

Sincerely,



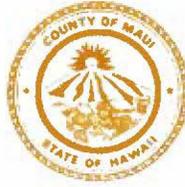
JAMES DS. BARROS
Governor's Authorized Representative

Attached: Determination of Uninhabitable Residences Wildfires, FEMA-4724-DR-HI (County of Maui; March 13, 2024) and

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director

KEANUKAPULANI S.K. LAU HEE
Deputy Managing Director



DEPARTMENT OF MANAGEMENT
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov

March 13, 2024

Mr. James DS. Barros, Administrator
Hawai'i Emergency Management Agency
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

**SUBJECT: Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI**

Dear Mr. Barros:

The County of Maui is actively engaged in restoring critical infrastructure in the areas impacted by the Maui Wildfires. While repairs are underway, many homes remain uninhabitable or restricted from access by previous residents.

The residential properties listed in the attachment to this letter are not habitable despite on-going restoration efforts. The majority of these residences are within an area that is designated for restricted local access only from 8 a.m. to 4 p.m. daily for area residents with a vehicle pass or ID to perform repairs or debris removal on their home.

Areas with limited access as of March 8, 2024:

- Zone 1C
- Zones 2A-F
- Zones 3A-C
- Zones 4A-C
- Zone 5G
- Zones 6B-E
- Zones 7A-G
- Zones 8A-C
- Zones 9A-M, excluding Zone 9K
- Zones 10 A-E
- Zones 11A-F
- Zones 12A-B
- Zone 13D
- Zones 14C-D
- Zone 15A
- Zone 16A

Mr. James DS. Barros
March 13, 2024
Page 2

Many residences also face other challenges such as lack of clean water or sewer services. These residences will remain uninhabitable until access restrictions are lifted. The County of Maui has not yet identified a timeline for these restrictions to be lifted.

For additional details or inquiries, please contact me at Keanu.LauHee@co.maui.hi.us.

Sincerely,



Keanukapulani S.K. Lau Hee
Deputy Managing Director

Attached: List of Uninhabitable Residences

Households Determined to be Uninhabitable based on County Map

Data as of 3/11/2024

REGISTRATION_ID	APPLICANT_NAME	DD_ADDRESS	CITY	ZIP_CODE	Water_Zones	Water_Zones	Sewer_Service_Zones	Air	Access Limitations	Power	Reason Property not Habitable
414047570	CRISWELL II, ROSCOE	134 WAHE LN APT 207	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048108	BUTLER, PAUL	134 WAHE LN APT 304	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048277	PITTMAN, TIMOTHY	1497 AIKAKEA RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414050382	MUPAS, PEDRO	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414051254	PAGE, STEVEN	1500 LIMAHANA CIR APT E203	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414054092	NUNEZ PEREZ, EVA	853 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054554	COUTINO GUILLEN, ELAINE	853 KANAKA LOOP UNIT 4	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054769	ARTHUR, GRAYSON	1579 LOKIA ST	LAHAINA	96761	2E	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414055682	GARGAN, KFFEE	127 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414057431	PANGLINAN, ALVIN	597 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059079	JEREMIAH, HENRY	927 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414059575	MOLINA, EDGARDO	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059938	LADOSI, IONELIA	420 AJO ST	LAHAINA	96761	13B	Area L-5	Inactive	Satisfactory	Closed	PENDING	Multiple Reasons, see red columns to the left for details
414061052	CEON, RAQUEL	262 KAHOMA VILLAGE PL APT 9-103	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414061515	FAITUA, HULITA	102 KAPUNAKEA ST # B	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414066781	STRAHE, JON	142 BAKER ST	LAHAINA	96761	8A	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414068149	GOMEZ VIGIL, PEDRO	624 KAHAKO ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414071854	WRIGHT, PALANI	269 KAHOMA VILLAGE LOOP APT 13-104	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414074807	IBALE, JULIEANNE	293 KAHOMA VILLAGE LOOP APT 17-106	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414079440	CASTRO, NORA	906 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414089411	INGAN, BEBERLY	597 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414092539	FONOHEMA, TRE	78 KAUJUALA RD	LAHAINA	96761	13B	Area L-5	Inactive	Satisfactory	Closed	PENDING	Multiple Reasons, see red columns to the left for details
414124445	ESPEJO, MARY JANE	584 KAHENA ST	LAHAINA	96761	9H	Area L-3A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414124614	EDLAD, ELIZABETH	736 PAUNAU ST	LAHAINA	96761	10E	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414125948	BALAGOS, RACHAEL	920 KOPILI ST	LAHAINA	96761	8C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445317266	GAZMEN, MARIENOR	618 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445320404	YOUNG, RYAN	105 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445326779	COUNTRYMAN, CHANDLER	20 KAI PALI PL	LAHAINA	96761	6B	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445339405	GANOY, CHERIELYN	932 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445341919	DUMLAO, ANGEL MAY	841 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445343967	VILLACASTEN, JEFFREY	88 KAPUNAKEA	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615732609	VALLEJO, LORNA	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615732680	LOUZON, LIOR	67 KANUIA PL	LAHAINA	96761	1C	Area L-1	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615741660	MALONEY, PAUL	268 KAHOMA VILLAGE PL # 8-105	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615747280	TAKATA, ALLAN	114 WAHUKULI RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615752222	MALAMALA, SIONE	1037 WAINEE ST APT D19	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630021693	TAYLOR, CRISTINA	731 MILL ST APT A	LAHAINA	96761	10D	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630021747	COSTA, CATHY	604 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
630026231	DELATORI, DYLAN	1586 AIKAKEA RD ROOM 2	LAHAINA	96761	2B	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048036	WRIGHT, ALEXA	257 KAHOMA VILLAGE LOOP APT 11-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048190	PASSAMONTE, PAUL	1300 LIMAHANA CIR APT C304	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414049427	HARRISSON, DUNCAN	45 E KUU AKU LN UNIT 306C	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414049587	HOSKINS, DIANA	1403 FRONT ST APT 402	LAHAINA	96761	4A	Area L-4C	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414051385	HOFFMAN, TODD	1276 NAHALE PL UNIT A	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054368	ANDRES, MARY	571 KAPUNAKEA ST	LAHAINA	96761	9I	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414056014	TUPOLA, HENRIDENE	847 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414058839	GALOIA, POUSSIMA	256 KAHOMA VILLAGE LOOP APT 10-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059015	PEREZ GALINDO, PABLO	134 WAHE LN APT 203	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059891	AGONOV, MARCEL	1015 KANAKA PL	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414060041	KEKAHUNA, SHAMRON	142 BAKER ST	LAHAINA	96761	8A	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414061489	GALAM, ABIGAIL	974 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414062471	AGDEPPA, DYLAN	896 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414063779	MARIANO, JANELLE	32 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414065506	VERSOJA, JONATHAN	1015 KANAKA PL	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414069211	UMAYAM, JULIOTO	1588 AA ST	LAHAINA	96761	2D	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414070750	PRESTAGE, HALLEY	153 PUALEI DR APT 3	LAHAINA	96761	16A	Area L-5	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414081037	IBALE, FLORENZIA	293 KAHOMA VILLAGE LOOP	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414085297	CABANILLA, FLORENTINO	963 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414091263	RICARDOSS, RHEENA	615 KAHAKO ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414098467	SMITH, NOLLE	15 E KUU AKU LN UNIT 102	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414115396	GARCIA, KALEALANI	1037 WAINEE ST APT D17	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414118717	SIMON, DEFLIA	906 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414130110	SAIOR, MAYDELYN	531 LAHANALUNA RD	LAHAINA	96761	9C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414133734	FRANKLIN, AAIINA	100 KENUI ST APT 110	LAHAINA	96761	7F	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445315321	KENIN, ERIN	232 MALANA ST	LAHAINA	96761	2F	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445315350	VAUDOUEY, TERENCE	603 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445316669	DRISCOLL, SUSAN	1660 LIMAHANA CIR	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445319719	BACLA, MARITES	31 E KUU AKU LN UNIT 214	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445330639	GONZALEZ GOMEZ, SAUL	268 KAHOMA VILLAGE PL # 8-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445346194	KANINO, JOHN	615 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615729710	MURPHY, JESS	430 KAHOMA VILLAGE LOOP	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615745587	LATU, ANGLIELINE	917 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615749076	SCHULZ-PETERSON, DEBORAH	1300 LIMAHANA CIR # C102	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615750017	LANOZA, ELIZABETH	957 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615763870	CORDERO, MARLENE	1252 NAHALE PL	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615814011	HINGANO, LUAKI	767 LUAKINI ST APT 10	LAHAINA	96761	10A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615885542	DURAN, ALANAROSE	287 KAHOMA VILLAGE LOOP # 16-103	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630017293	JARANILLO, JESSIE	1037 WAINEE ST A22	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630027320	McGREGG, MICHAEL	790 FRONT ST UNIT 1	LAHAINA	96761	10A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414049386	KALEPA, FRANK	939 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414058936	YAMADA, KIMBERLY	262 KAHOMA VILLAGE LOOP UNIT 9-106	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414064319	TAYLOR, KIANI	256 KAHOMA ST # 10-104	LAHAINA	96761	4C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414069014	POLISKI, ALYSSA	1300 LIMAHANA CIR APT C104	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414090501	TAGALOA, SAVAIL	603 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414096496	REKDAHL, JACOB	1495 AIKAKEA RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414123007	CEBALLOS, LINDSAY	105 KANUIA RD	LAHAINA	96761	1C	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414124612	FINC, JASON	1329 KAHOMA ST	LAHAINA	96761	4C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
44535291	KRON, ROBERT	1474 MALO ST	LAHAINA	96761	2A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414074614	MIRANDA, SASHA	963 KANAKA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
41409061											

STATE OF HAWAII NCS TRANSITION PROCESS

MEMORANDUM

March 13, 2024

1. **ORGANIZATIONS.** The Non-Congregate Sheltering (NCS) transition process in the County of Maui, Hawaii is led by the State of Hawaii (State) Emergency Management Agency (HI-EMA). The Federal Emergency Management Agency (FEMA) is a key partner in this process, providing reimbursement and Direct Housing options for FEMA-eligible survivors. Under the supervision of HI-EMA, representatives from the American Red Cross (ARC) and groups of local voluntary, faith-based, and community organizations, collectively referred to as the Aunty Brigade, provide additional support roles.
2. **PURPOSE OF MEMORANDUM.** This memorandum authorizes the NCS Task Force to implement actions outlined in this memorandum as part of the ongoing effort to transition households from Non-Congregate Sheltering for DR-4724-HI.
3. **AUTHORITY.** The Federal Coordinating Officer (FCO) is appointed to coordinate federal assistance following a declared disaster or emergency. The State Coordinating Officer (SCO) is designated to coordinate state and local disaster assistance efforts with those of the Federal Government.
4. **ROLES**
 - A. All Organizations Identified
 - Support the overall recovery effort
 - Transition households from NCS to an improved housing solution offered by FEMA, the State of Hawaii, or other entities
 - B. FEMA
 - FEMA will continue its efforts to move FEMA-eligible HHs from NCS into Direct Housing. FEMA will notify HI-EMA each time that a survivor declines an offer from FEMA for housing assistance, until a household declines for a fourth and final time, after which the household will receive exit instructions from the State of Hawaii
 - C. HI-EMA
 - HI-EMA will implement the procedures outlined in this memorandum for households that are referred to both FEMA Direct Housing and State Housing Assistance programs
 - HI-EMA will coordinate with the ARC, DHS, and Aunty Bde on any outreach

D. ARC

- ARC will conduct direct outreach to households as directed by HI-EMA

E. Local influencers (“Aunty Bde”)

- Aunty Bde will conduct direct outreach to the households as directed by HI-EMA

5. **INFORMATION SHARING:** Information shared as part of this effort will follow existing and/or future data-sharing agreement between parties identified in this memorandum.

6. **IMPLEMENTATION:**

FEMA Direct Housing

A survivor in NCS will have four (4) opportunities to accept the Direct Housing option offered by FEMA. When FEMA approves the survivor for Direct Housing and sends an offer to the survivor, the survivor will decide whether to accept the offer. Each time that the survivor declines a FEMA offer, FEMA will notify the NCS Task Force at HI-EMA.

FEMA will send the survivor four offers in total. The NCS Task Force will coordinate with the ARC and the Aunty Bde to conduct direct outreach to the survivor in the event that the survivor declines an offer from FEMA.

- A. FEMA will contact the survivor after each declination. If the survivor declines four (4) FEMA housing assistance offers, the ARC will deliver a letter to the survivor to explain that the household will have seven (7) days to vacate or pay to remain in the property. FEMA will share the reasons for declination with the State on a daily basis.
- B. FEMA will alert HI-EMA after the second declination and HI-EMA will alert the Aunty Bde to initiate contact if the survivor declines two (2) offers from FEMA.

State of Hawaii Housing Assistance

A survivor in NCS will have two (2) opportunities to accept the option offered by the NCS Task Force for State-funded housing assistance. When the NCS Task Force, or the State, approves the survivor for housing assistance and sends an offer to the survivor, the survivor will decide whether to accept the offer.

The NCS Task Force, or an entity designated by the State, will send the survivor four offers in total. The NCS Task Force will coordinate with the ARC and the Aunty Bde to conduct direct outreach to the survivor in the event that the survivor declines an offer from FEMA.

- C. The ARC will contact the survivor after each declination. If the survivor declines two (2) NCS Task Force housing assistance offers, the ARC will deliver a letter to

the survivor to explain that the household will no longer be eligible for State housing services. If an applicant declines due to lack of transportation to school for a minor, accessibility for a household member with a disability, or lack of available in-home caregiving or health services near the offered unit, they will be permitted to stay in NCS until a solution is identified.

D. The Aunty Bde will initiate contact if the survivor declines one (1) offer from the NCS Task Force.

7. **EFFECTIVE DATE.** This memorandum will become effective on the date the last individual signs the memorandum.



Federal Coordinating Officer

13 MAR 2024
Date

J. B. B.

State Coordinating Officer

Mar 13, 2024
Date



DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA

HAWAI'I EMERGENCY MANAGEMENT AGENCY
KE'ENA HO'OMALU PŌULIA O HAWAI'I

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT
LUNA HO'OMALU PŌULIA

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY MANAGEMENT
KAHU HO'OMALU PŌULIA

**THE HAWAI'I EMERGENCY MANAGEMENT AGENCY ANNOUNCES NEW
HOUSING ELIGIBILITY POLICY FOR LAHAINA FIRE-DISPLACED RESIDENTS**

FOR IMMEDIATE RELEASE

March 14, 2024

HONOLULU - Households in Non-Congregate Sheltering (NCS) were initially part of the response efforts following the Maui wildfires. The state is now prioritizing the urgent transition of individuals and families out of NCS and into more permanent housing solutions. This proactive approach is an important step as the state progresses toward recovery efforts in the aftermath of the devastating events of August 8.

The state has developed a comprehensive strategy to move individuals and families out of NCS, offering them choices that will necessitate them to make firm arrangements. The Hawai'i Emergency Management Agency (HI-EMA) has unveiled a new policy regarding the eligibility of housing services for individuals and families who were displaced by the Lahaina fires. Under this new policy, households may no longer be eligible for NCS services under certain circumstances.

A recent business rule agreed upon by the Federal Emergency Management Agency (FEMA) and the state has been issued, authorizing HI-EMA and a joint task force to implement actions that will help facilitate efforts to transition households out of NCS currently living in hotels. Continual engagements with clients will be crucial in determining their outcomes. A survivor in NCS seeking support for the FEMA-eligible program will have four opportunities to accept their Direct Housing option, while survivors in NCS seeking support through the state of Hawai'i's Housing solution - they will be given two opportunities to accept an option. The state's plan is to ultimately wrap up its NCS program.

The NCS Joint Task Force is comprised of HI-EMA, FEMA, American Red Cross (ARC), Hawai'i Department of Human Services (DHS), and representatives from other community organizations. Community engagement will play a pivotal role in the NCS transition process, as the Joint NCS Task Force will be responsible for initiating contact with survivors and implementing procedures should clients decline offers from the task force.

This new policy is designed to ensure that households facing challenges in accepting housing options are given the necessary support and time to find a suitable solution. HI-EMA Administrator, James Barros expressed, "We are committed to working with individuals and families to address their specific needs and provide assistance in finding alternative housing options so that families can regain a sense of normalcy and stability in their lives."

As the state moves forward into its recovery efforts, it remains committed to ensuring that all individuals and families have access to safe and secure housing. "We will continue to work closely with our partners to develop innovative and compassionate solutions that prioritize the well-being of those we serve," declared Barros.

#

Media Contact:

S. Kīelekū Amundson
Communications Director
Hawai'i Emergency Management Agency
Phone: 808-733-4300 Ext 522
Email: shirley.t.k.amundson@hawaii.gov

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
MANAGEMENT
PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

March 14, 2024

Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

Non-Congregate Sheltering
Request for Extension of Condominiums/Apartments
to August 10, 2024
FEMA-4724-DR-HI

Dear Mr. Dargan,

On January 15, 2024, Federal Coordinating Office (FCO) Thomas J. Dargan, on behalf of the Federal Management Emergency Agency (FEMA), and with concurrence from the Assistant Administrator of the Recovery (AAR) authorized a time extension of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. The extension for 60-days made the end date April 10, 2024.

Subsequently, on February 20, 2024, Assistant Administrator Recovery Directorate William Hagmaier approved the State of Hawaii's request to use condominiums/apartments for the provision of Public Assistance-supported NCS. The approval extended the use of condominiums/apartments through April 4, 2024, subject to the conditions outlined in the letter. HI-EMA continues to oversee NCS in accordance with FEMA's Public Assistance Program and Policy Guide (PAPPG) Version 4 and the policy described in the FEMA's "Emergency Non-Congregate Sheltering" memorandum, dated June 28, 2022.

NCS is currently authorized to operate until April 10, 2024. On March 1, 2024, HI-EMA requested that FEMA approve an extension for NCS to August 10, 2024.

The use of condominiums/apartments for the provision of NCS is authorized through April 4, 2024. HI-EMA requests that the use of condominiums/apartments for the provision of NCS is extended to August 10, 2024 to align with the request for extension of NCS services in HI-EMA's February 15th letter.

HI-EMA has evaluated conditions that make this extension critical, including the following circumstances:

1. *Interim Housing Options* - The State of Hawaii expects that the Interim Housing TTHU Group Sites will be ready to transition households no earlier than August 1, 2024. By extending the provision of condominiums/apartments to August 10, 2024, the State will have the much needed flexibility to transition households from NCS to an interim housing option. HI-EMA has been working closely with FEMA to work towards this transition.
2. *Housing Shortage* – Housing shortages have been an acknowledged challenge for Maui recovery. The continued use of condominiums will allow survivors to remain in a stable housing situation and provide a sense of normalcy while the State finds viable solutions for more of these households.
3. *Food Security* – Households sheltered in hotels have reported challenges with food insecurity as outlined in a letter shared with FEMA on February 22, 2024. Condominiums/apartments provide access to equipment and appliances for cooking, cleaning, and refrigeration for households. By providing condominiums/apartments through NCS, the State enables households to prepare meals that meet their own nutritional needs, including accommodating allergies and medical conditions, without having to rely on costly external sources to feed their families. This outcome is more cost-efficient for the program as well.

As stated in FEMA’s January 15th letter to HI-EMA, “FEMA is aware of the challenges described in your request letter concerning the pre-disaster housing crisis in Maui County and how the impact of the devastation in Lahaina is further contributing to the extremely limited availability of affordable housing options.” HI-EMA continues to observe the same challenges in the limited availability of housing options for survivors that was acknowledged by FEMA in January.

The State of Hawaii will continue to work with the survivors and expedite the finding housing options for applicants sheltered in condominiums whenever available. The Interim Housing Site and Direct Lease will contribute significantly to filling this gap in the next few months. The State’s understanding is that FEMA has secured sufficient units to support all FEMA Direct Lease eligible households.

The State of Hawaii appreciates FEMA’s continued partnership and commitment to the recovery of the survivors. Thank you for your consideration of this request.

For additional details or inquiries, please reach out to Darrick Ching, NCS Task Force Lead, at 808-798-1804 or darrick.j.m.ching@hawaii.gov.

Sincerely,



JAMES DS. BARROS
Governor’s Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
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STATE OF HAWAII
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4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

March 18, 2024

Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

Reimbursement of NCS Applicants in Transition to Direct Housing,
FEMA-4724-DR-HI

The Federal Management Emergency Agency (FEMA) continues to transition eligible households from Non-Congregate Sheltering (NCS) to FEMA Direct Housing solutions. As part of this effort, the State of Hawaii Emergency Management Agency (HI-EMA) requests that FEMA consider the survivor households described in this letter as reimbursable by FEMA.

1. HI-EMA has identified households that were categorized as reimbursable by FEMA for NCS until these households were approved for FEMA Direct Housing.
 - FEMA categorized the households as reimbursable for NCS.
 - Then, FEMA approved and licensed-in the households for FEMA Direct Housing.
 - The households were provided a seven (7) day window to exit NCS.
 - Due to the transition period, these households were categorized as non-reimbursable (for NCS) when the households were licensed-in to FEMA Direct Housing.
 - HI-EMA considers this recategorization to be inaccurate because the households are not receiving a duplicative benefit by transitioning from sheltering to FEMA Direct Housing.
 - HI-EMA requests that FEMA reimburse the State for the NCS costs related to these households.
2. HI-EMA has identified households that are eligible for FEMA Direct Housing, but not reimbursable for NCS.
 - FEMA categorized the households as non-reimbursable for NCS.
 - Then, FEMA approved the households for FEMA Direct Housing.

March 15, 2024

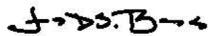
Page | 2

- Due to delays in placing some households, survivors may remain in NCS while categorized as non-reimbursable (for NCS). In some cases, this delay could span weeks or months.
- HI-EMA has no control over the time period required to move the household into the FEMA unit. As a result, the State continues to cover the sheltering costs of these households until they are moved into their FEMA Direct Housing units.
- HI-EMA requests that FEMA reimburse the State for the NCS costs related to these households during the time period that spans the delay.

The State of Hawaii appreciates FEMA's continued partnership and commitment to the recovery of the survivors. Thank you for your consideration of this request.

For additional details or inquiries, please reach out to Darrick Ching, NCS Task Force Lead, at 808-798-1804 or darrick.j.m.ching@hawaii.gov.

Sincerely,

Handwritten signature of James D.S. Barros in black ink.

JAMES DS. BARROS
Governor's Authorized Representative



FEMA

March 21, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of March 17, 2024, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received from HIEMA on March 17, 2024, and processed by FEMA (data matched) on March 19, 2024.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. Subsequently, FEMA approved an additional extension through April 10, 2024.

On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement is to allow FEMA to assist and inform the State, prior to seeking reimbursement, of HH eligibility for reimbursement under FEMA's Public Assistance (PA) Program.

The corresponding report, referenced within this letter and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheet data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 83 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta between the "Red Cross HH Currently in NCS" and "FEMA Registrations Matched to HH Currently in NCS" totals reported in the table below.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	1,377
FEMA Registrations Matched to HH Currently in NCS	1,294
FEMA Registrations Reimbursable	860
FEMA Registrations Non-Reimbursable	434

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	1
No Contact or Withdrawn	18
Failed Occupancy Verification	7
Failed Identity Verification	3
Have Insurance AND Have Not Received Rental Assistance	166
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	19
No Habitability Repairs Required or Blank and No GIS Stamp	49
Travel Completed Utilizing Section 425 Transportation Assistance	1
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance	61
P-3 - Declined Direct Housing Unit	11
Count of Registrations with Multiple Non-Reimbursable Reasons	98

FEMA reiterates its appreciation of Hawaii's continued assistance in providing the requested data regarding the individuals and households sheltered. If you have any questions regarding this matter, please contact Michael Gayrard, Region 9 PA Field Operations Branch Chief, at (510) 504-8045.

Sincerely,

THOMAS J
DARGAN

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Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Joseph Engler, Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9
Christopher Ruley, Infrastructure Branch Director, FEMA-4724-DR-HI
Shahdy Monemzadeh, Individual Assistance Branch Director, FEMA-4724-DR-HI



April 1, 2024

James DS Barros
Hawaii Emergency Management Agency
Department of Defense
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

Re: Non-Congregate Sheltering, Comprehensive Data Report
Current as of March 26, 2024, FEMA-4724-DR-HI

Dear Administrator Barros:

This correspondence is to provide you with our analysis of the eligibility for reimbursement of households (HH) within Non-Congregate Sheltering (NCS), based on reporting data received from HIEMA on March 26, 2024, and processed by FEMA (data matched) on March 30, 2024.

On September 8, 2023, the Federal Emergency Management Agency (FEMA) approved Hawaii's notice of NCS, within counties designated under DR-4724-HI, with the authorized period for NCS later extended through February 10, 2024. Subsequently, FEMA approved an additional extension through April 10, 2024.

On October 23, 2023, a daily reporting requirement was implemented for registrants in NCS. The purpose of this reporting requirement was to allow FEMA to assist and inform the State, prior to seeking reimbursement, of HH eligibility for reimbursement under FEMA's Public Assistance (PA) Program. This daily reporting requirement has been adjusted to three days per week to allow for operational efficiencies through providing and processing meaningful data updates. HI-EMA is now required to submit data reporting each Sunday, Tuesday and Thursday.

The corresponding report, referenced within this letter and provided independently as a spreadsheet, provides details for all HH ever in NCS and which have been data matched to FEMA registrations. The spreadsheets data can also be filtered to show only those currently in NCS to reflect the specific HH referenced within this letter, to allow the State to identify and review those HH represented within the table below.

Any NCS HH not matched to a FEMA registration are non-reimbursable. A total of 26 HH currently in NCS have not been matched to a FEMA registration, as represented by the delta

between the “Red Cross HH Currently in NCS” and “FEMA Registrations Matched to HH Currently in NCS” totals reported in the table below.

Additionally, a “pending non-reimbursable” category has been included in the summary table below to account for those HH that have been licensed into a direct lease unit under FEMA’s Direct Housing Program within 7 days of the HI-EMA report date. All HH remain reimbursable up to 7 days following their license-in date and will become non-reimbursable if they remain in NCS more than 7 days beyond the date on which they are listed as licensed in on the corresponding report.

Please note that these reports may continue to be updated to reflect the best information available to FEMA, however status designations (Reimbursable/Non-Reimbursable) as listed in the table below may not account for certain criteria that may affect eligibility for PA reimbursement.

The State should analyze these cases and notify FEMA of any instances which may impact eligibility for future PA NCS reimbursement.

Categories	# Households (HH)
Red Cross HH Currently in NCS	1,296
FEMA Registrations Matched to HH Currently in NCS	1,270
FEMA Registrations Reimbursable	811
Licensed into Direct Lease Unit within 7 days of HI-EMA Report Date	68
FEMA Registrations Non-Reimbursable	391

Non-Reimbursement Reason	# Registrations (HH) with Only One Non-Reimbursable Reason
Non-Primary Residence	1
No Contact or Withdrawn	18
Failed Occupancy Verification	9
Failed Identity Verification	2
Have Insurance AND Have Not Received Rental Assistance	156
P-3 - Declined Direct Housing Unit	7
Direct Housing Pre-Placement Interview P1 - Living in Damaged Dwelling, OR P2 - Found Another Housing Resource	23
No Habitability Repairs Required or Blank and No GIS Stamp	46

Travel Completed Utilizing Section 425 Transportation Assistance	1
Licensed into Direct Lease Unit under FEMA Direct Housing Assistance (>7 days prior to HI-EMA Data Report Date)	33
Count of Registrations with Multiple Non-Reimbursable Reasons	95

FEMA reiterates its appreciation of Hawaii’s continued assistance in providing the requested data regarding the individuals and households sheltered. If you have any questions regarding this matter, please contact Michael Gayrard, Region 9 PA Field Operations Branch Chief, at (510) 504-8045.

Sincerely,

**THOMAS J
DARGAN**

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Thomas J. Dargan
Federal Coordinating Officer
FEMA-4724-DR-HI

Cc: Lorinda Wong Lau, Resilience Branch Chief, Hawaii Emergency Management Agency
Joseph Engler, Recovery Division Director, FEMA Region 9
Jesus Ceja, Individual Assistance Branch Chief, FEMA Region 9
Michael Gayrard, Public Assistance Branch Chief, FEMA Region 9
Christopher Ruley, Infrastructure Branch Director, FEMA-4724-DR-HI
Shahdy Monemzadeh, Individual Assistance Branch Director, FEMA-4724-DR-HI



FEMA

April 5, 2024

MEMORANDUM FOR: Robert J. Fenton
Regional Administrator
FEMA Region 9

ATTENTION: Thomas J. Dargan
Federal Coordinating Officer
FEMA Region 9
FEMA-4724-DR-HI

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

SUBJECT: State of Hawaii Emergency Management Agency (HI-EMA)
Requests to Extend Non-Congregate Sheltering (NCS)
FEMA-4724-DR-HI

This is in response to your memoranda dated February 22, 2024; March 21, 2024; March 22, 2024; March 27, 2024 (2); regarding requests from HI-EMA (recipient) under FEMA-4724-DR-HI to waive the 30-day incremental extension requirement¹ as FEMA did in memos dated August 6, 2023 and September 6, 2023; extend the use of FEMA Public Assistance (PA) funding for Noncongregate Sheltering (NCS) in apartments and condominiums; extend the use of PA funding for feeding and wraparound services for households in NCS; and extend NCS beyond the initial six-month period of performance from the major disaster declaration date.

Due to the extenuating circumstances and the continued needs of the those in affected communities as communicated in the recipient's requests, I am issuing the following approvals and denials to HI-EMA's requests for the use of PA funds as follows:

- A request made by HI-EMA on February 8, 2024 to waive the 30-day incremental extension requirement retroactively and through February 10, 2024 is partially granted and retroactively extended through November 15, 2023. NCS is a temporary emergency protective measure intended to provide immediate life safety resources until other forms of assistance become available. Once adequate alternative forms of assistance are available, NCS is no longer warranted for a household. FEMA recognizes that the unexpected and devastating nature of the fires, both in terms of the number of households displaced and the extent of the impact on housing resources, created an environment of confusion and a need to focus on immediate life safety interventions. Consequently, it was not feasible for the State to obtain and exchange the needed information to identify households that were no longer in of need NCS or were otherwise ineligible for continued assistance. After a

¹ [Emergency Non-Congregate Sheltering](#) (June 28, 2022)

careful review of the timeline of the incident, response activities, and communications between FEMA and the State, I have determined that the necessary information was available no later than November 15, 2023, and therefore HI-EMA's request to extend the requirement for 30-day incremental extensions as a condition of eligibility is approved through that date.

- A request made by HI-EMA on March 14, 2024 to extend the use of PA funding for condominiums and apartments for NCS through August 10, 2024 is denied. NCS for condominiums and apartments were previously extended through April 4, 2024. There is now a sufficient supply of available hotel rooms to meet the State's NCS requirements. Condominiums and apartments are no longer necessary or cost-effective NCS alternatives.
- A request made by HI-EMA on February 22, 2024 to extend the use of PA funding for feeding and wraparound services for households in NCS through April 10, 2024 is denied. Feeding and wraparound services were previously extended through February 10, 2024. There are sufficient food sources and other resources available in the area to support displaced households without the need for direct feeding operations or wraparound services after that date.
- A request made by HI-EMA on March 1, 2024 to extend NCS activities in Maui County by 122 days, from April 10, 2024 to August 10, 2024, is approved for 30 days through May 10, 2024, with the following conditions, in addition to those already stated in previous correspondence:
 - No later than April 25, 2024, the State must deliver a plan to transition households from NCS into interim housing options, which may include FEMA IA Direct Housing or State/local housing solutions. The plan should incorporate the utilization of Disaster Case Management and, if needed, housing navigator roles.
 - FEMA will utilize its best efforts to contact households eligible for direct housing through the Individuals and Households Program. A household that cannot be contacted within five days of the first attempt is no longer eligible for the reimbursement of NCS costs.
 - Any subsequent extension request must be made in 30-day increments submitted no less than fifteen days prior to the expiration of the previous extension.

If you have any questions, please contact Robert Pesapane, Division Director for the Public Assistance Division via email at Robert.Pesapane@fema.dhs.gov.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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KA 'OIHANA PILI KAUA
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4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

April 24, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: Request for Extension of Non-Congregate Sheltering (NCS)
FEMA-4724-DR-HI

On April 5, 2024, the Assistant Administrator William C. Hagmaier, on behalf of the Federal Management Emergency Agency (FEMA), sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan in which FEMA authorized a time extension of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. HI-EMA continues to oversee NCS in accordance with FEMA's Public Assistance Program and Policy Guide (PAPPG) Version 4 and the policy described in the FEMA's "Emergency Non-Congregate Sheltering" memorandum, dated June 28, 2022. The memorandum extended NCS to May 10, 2024. FEMA stated that any subsequent extension request must be made in 30-day increments submitted no less than fifteen days prior to the expiration of the previous extension.

Request for 30-Day Extension

In alignment with FEMA's requirements, the State of Hawaii Emergency Management Agency (HI-EMA) requests a 30-day extension of NCS to June 10, 2024.

The NCS Transition Task Force has made significant progress in reducing the number of households in NCS. At the beginning of March, the NCS population was approximately 1,568 Households according to the FEMA IA Direction and Strategy report. As of 4/24/2024, there were 801 households remaining in NCS, a reduction of 767 households during this time. Despite the strong pace of decompression, it is not likely that all households will be transitioned out of NCS and into to an intermediate solution by the current deadline of May 10, 2024. This extension will enable the State of Hawaii (the "State") to continue to meet the needs of these households while decompressing the program at an expedient pace.

HI-EMA has collaborated with other State partners, FEMA, and Maui County to develop NCS transition pathways. These pathways offer appropriate intermediate housing solutions from multiple State and FEMA programs and requires close coordination to offer solutions that meet the unique needs of the survivor as practically possible. Housing shortages have been an acknowledged challenge for Maui recovery; therefore, the additional time will allow the State to find viable solutions for more of these households. The three pathways identified for NCS shelter residents are 1) a FEMA Direct Housing unit, 2) a State Interim Housing unit, or 3) a Survivor Identified Solution. An extension of NCS will provide additional time to ensure households are connected with one of the housing solutions outlined below.

Transition Pathways:

1. *State Interim Housing:* The State of Hawaii is pursuing multiple State programs to decompress NCS, including the Rental Assistance Program (RAP), which offers up to a twelve month stay in a unit, and two new housing developments called Hale 'O Lā'ie (fka Haggai Institute) and Kala'iola. The recently acquired Hale 'O Lā'ie property is expected to be ready for occupancy in May 2024. The State expects that newly constructed Interim Housing at the Kala'iola site will be ready to transition households around July 2024. An extension of NCS will allow the State to provide a thoughtful and survivor-centric approach to match survivors to an appropriate housing solution.
2. *FEMA Direct Housing:* Of the current NCS population, FEMA has identified about 450 households as eligible for Direct Housing as of 4/17/2024. Of the total, approximately 400 households will be served by the FEMA Direct Lease option and approximately 50 households will be served by the FEMA ATTHU Group Site. There are additional households still under eligibility review for the Direct Housing program. An extension of the NCS program will afford FEMA more time to license households into Direct Housing units and allow more time for the development of the FEMA group site, which is expected to become available in late October 2024.
3. *Survivor Identified Solutions:* The State continues to work with Survivors, Maui County, FEMA and State VALs, and non-government organizations (NGO) to make impacted homes habitable for return. FEMA's Geographic Information Systems (GIS) team continues to support the Maui County in determining when homes will become available for those who are able to return to their properties based on the availability of necessary utilities (potable water, sewerage, and electric utilities). The extension will allow for additional time for debris removal and utility restoration, which will be critical in returning survivors to their homes. Simultaneously, the State is collaborating with Long-Term Recovery groups and NGOs to supplement the limited capacity of existing vendors on Maui to provide cleaning and repair services to survivors. The NCS Task Force is also providing resources to explore alternative housing solutions if returning home is not feasible. It is noted that a number of NCS families have identified their own housing solutions.

Additional Separate Request

In addition to the above extension request and in the interest of expediting the full decompression of NCS, HI-EMA requests FEMA approval to reactivate the Transitional Sheltering Assistance (TSA) program to support wildfire survivor families that do not yet have an interim or permanent housing solution. The State believes that TSA may be a good solution for many NCS households that are awaiting the build-out and availability of FEMA's and the State's ATTHU group sites. The State

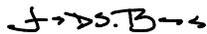
also welcomes feedback and guidance on additional or alternate FEMA programs that could provide alternative temporary housing solutions to NCS residents and benefit the State overall.

The State of Hawaii will continue to work with program partners and survivors to expedite their transition out of the NCS program. HI-EMA requests that FEMA approve this extension of NCS to June 10, 2024 to address the need for additional time to transition survivors into one of the housing solutions outlined above. HI-EMA also requests approval of the TSA program, or any alternative FEMA solution that may be in the best interest of Maui wildfire survivors and the State.

The State of Hawaii appreciates FEMA's continued partnership and commitment to the recovery of the survivors. Thank you for your consideration of this request.

If you have any questions or require additional information, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,

A handwritten signature in black ink that reads "J.D.S. Barros". The signature is written in a cursive, slightly stylized font.

JAMES DS. BARROS
Governor's Authorized Representative



Non-Congregate Sheltering Program Transition Plan



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Background and Purpose

On August 8, 2023, the Acting Governor declared a state of emergency in the counties of Maui and Hawai'i (i.e. Big Island) because several large wildfires were identified in the counties, including in North and South Kohala (Hawai'i County) and the Olinda, Pulehu, Kula, and Lahaina areas (Maui County). Then, on August 10, 2023, President Joseph Biden declared a major disaster in Hawai'i, DR-4724-HI.¹

Exacerbated by high winds from Hurricane Dora, the fires in the counties of Maui and Hawai'i burned thousands of acres, forced evacuations, severed communication channels, and necessitated the shutdown of roads and schools. The fires burned 1,283 acres in upcountry Maui, 3,240 acres in south Maui, and 2,170 acres in Lahaina.² Maui County experienced substantial (101) casualties and property destruction, leaving nearly 10,000 individuals displaced from their homes and the town of Lahaina destroyed.³ FEMA estimated that 1,288 residential structures, which consisted of 4,002 units, were completely destroyed.

By September 8, 2023, upwards of 8,000 survivors who were displaced by the Maui wildfires were relocated from congregate shelters to 39 hotels and hundreds of Airbnb units through the efforts of the American Red Cross (ARC), Hawai'i Emergency Management Agency (HIEMA), and FEMA⁴. The fire's widespread impact to the limited housing stock in Maui has presented a significant challenge for the State both in identifying cost effective sheltering locations and alternative housing as the sheltering program ramps down.

On April 5, 2024, the Assistant Administrator William C. Hagmaier, on behalf of the Federal Management Emergency Agency (FEMA), sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan in which FEMA authorized a time extension of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration.

The memorandum extended NCS to May 10, 2024. This memo also required that no later than April 25, 2024, the State must "deliver a plan to transition households from NCS into interim housing options, which may include FEMA IA Direct Housing or

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/08/10/president-joseph-r-biden-jr-approves-hawaii-disaster-declaration-3/>

² https://www.maupolice.com/uploads/1/3/1/2/131209824/pre_aar_master_copy_final_draft_1.23.24.pdf

³ <https://dod.hawaii.gov/hiema/files/2023/01/Ninth-Proclamation-Relating-to-Wildfires-2401019.pdf>

⁴ <https://governor.hawaii.gov/newsroom/office-of-the-governor-news-release-gov-green-outlines-support-for-lahaina-survivors-and-businesses/>



State/local housing solutions. The plan should incorporate the utilization of Disaster Case Management and, if needed, housing navigator roles.”

This information contained in this document is the State’s response to FEMA’s request.

Non-Congregate Sheltering (NCS)

In the immediate aftermath of the disaster, several State, County, and local community partners coalesced to identify immediate housing options for survivors. Given the magnitude of the disaster’s impact and the long-term recovery need, Governor pursued authorization for a Non-Congregate Sheltering (NCS) program. NCS is overseen by the State of Hawaii Emergency Management Agency (HI-EMA), administered by the American Red Cross (ARC), and provides shelter to survivors. As of September 27, 2023, the American Red Cross ran over 39 NCS sites for up to 3,000 households. At that point, those households represented approximately 8,000 people. As of April 20, 2024, there are less than 900 households still sheltering in the NCS Program.

The purpose of NCS is to provide a short-term emergency shelter for individuals and families displaced from their homes by the disaster. The State, in collaboration with FEMA and Maui County, has developed a comprehensive strategy to transition individuals from NCS, offering them choices of intermediate housing arrangements. This approach requires collaboration across multiple agencies. NCS is currently authorized by FEMA through May 10, 2024.

NCS Transition to Intermediate Housing Solutions

Transition Pathways

At the time of this Transition Plan, 898 Households were sheltering in the NCS Program. There are three distinct pathways households will pursue to exit the NCS Program.

1. **FEMA Direct Housing:** Households eligible for FEMA Direct Housing Assistance are presumed to have a viable interim housing option and are not expected to be transitioned by the State of Hawaii. The Direct Housing Program is offering both a Direct Lease option and a Alternative Temporary Transportable Unit (ATTHU) group housing site, which is expected to become available in October 2024. As of April 20, 449 households are in the queue for Direct Housing from FEMA, about 397 of which will be served by the Direct Lease program and about 52 households will be offered housing in the FEMA group site.



2. **State Intermediate Housing:** The State, as outlined in this Housing Transition Plan, will transition the households ineligible for FEMA Direct Housing. For households that are not eligible for FEMA Direct Housing, HI-EMA will refer the household to a State-funded solution or a non-profit partner. The interim housing programs are described in the next section of this plan.
3. **Survivor Identified Solution:** The State and County have a role to play in supporting Survivors to identify private housing solutions, including a return to their pre-disaster residence and identification of new housing options. County of Maui is working to restore critical infrastructure and communicate to households when their properties are available to re-occupy or repair. The State is coordinating with local Long-term Recovery groups and multiple nonprofit partners including the American Red Cross to provide financial assistance and supplies to perform minor repairs to enable a return home. The NCS Task Force is also providing resources to explore alternative housing solutions if returning home is not feasible.

State Interim Housing Solutions

Despite limited housing stock, HI-EMA has been working with State agencies and partner organizations to secure units to transition households. HI-EMA has accelerated the pace of decompression, transitioning over 500 households in the last 30 days.

The following interim housing solutions have been identified by the State to assist with closing the housing gap until permanent housing solutions and funding are available to survivors. Interim housing timeframes typically range from three months to eighteen months post-disaster.

Department of Human Services (DHS) Rental Assistance Program (RAP)

On December 1, 2023, Governor Josh Green and DHS announced a Rental Assistance Program (RAP) for survivors of the Maui wildfires who are not eligible for FEMA Direct Housing assistance.⁵ RAP is facilitated by the community-based organization Global Empowerment Mission in collaboration with Airbnb.⁶ The program reviews households for eligibility, connects with eligible survivors to match them to a housing unit based on their family composition and needs, and books survivors with a housing solution for up to twelve (12) months.

⁵ <https://humanservices.hawaii.gov/blog/dhs-rental-assistance-program-rap-faqs/>

⁶ <https://humanservices.hawaii.gov/blog/state-of-hawaii-department-of-human-services-launches-2-5m-rental-assistance-program/>



Hale 'O Lā'ie

On February 8, 2024, the State legislature appropriated funds to the Hawai'i Housing Finance and Development Corporation (HHFDC) to convert the Haggai Institute, formerly operated as Maui Sun Hotel, into affordable workforce housing for teachers and preschool classrooms.⁷ In light of the disaster, the intent has shifted to provide an intermediate housing resource for survivors. As of March 28, 2024, the property has been acquired by the State and site preparation work has begun to transform this site into a recovery resource called Hale 'O Lā'ie. The Hale 'O Lā'ie site is expected to provide 175 units to support families starting in May of 2024.

Kala'iola State Group Housing Site

The State and County is developing interim housing for survivors on a site named Kala'iola. Kala'iola is located on a 72-acre state land parcel near the Lahaina Civic Center. As of February 26, 2024, the State and County plan to construct approximately 450 units. The Kala'iola group site is a part of the larger Leiali'i development, which contains the FEMA Direct Housing Group Site as well. The Kala'iola housing units are expected to become available in July/August of 2024.

Disaster Case Management Program

The Disaster Case Management Program (DCMP) has a critical role in the transition of households out of NCS. Disaster Case Managers connect with disaster survivors to assess their unique situation, including housing challenges, financial constraints, medical concerns, transportation issues, and work with the survivor to develop a recovery plan. These DCMP services enable survivors to navigate housing options more effectively and organize supplementary resources to facilitate a relocation to intermediate housing locations.

DCMP services are available to any survivors impacted by the disaster, regardless of their eligibility for FEMA or other Federal assistance. The State launched an interim DCMP on November 13, 2023. As of February 21, 2024, the State has since transitioned the interim DCMP to the FEMA-funded DCMP.⁸

To implement the DCMP, DHS partnered with experienced disaster case management organizations, including St. Vincent DePaul (SVDP). DHS and SVDP hosted multiple community meetings and presented the DHS DCMP to dozens of organizations to solicit

⁷ https://dbedt.hawaii.gov/hhfdc/files/2024/02/2024-0208-III.E-Haggai_County-MOA-Ground-Lease-SECURED.pdf

⁸ <https://humanservices.hawaii.gov/dhs-announces-four-community-based-organizations-awarded-to-participate-in-the-disaster-case-management-program/>



their application to participate in this program. DHS has selected four Community Based Organizations (CBOs): Catholic Charities Hawai'i, Family Promise Hawai'i, Family Life Center, and Aloha House.⁹

DHS has served 693 households to date and is currently working to scale from the current capacity of about 1,260 households to the full impacted survivor population. The DCMP has enhanced care navigation system to allow survivors to call 211 to request an intake meeting with the DCMP. This process has improved outreach communication with the survivors. The DCMP will serve as a guide to the survivor, answering questions, navigating resources, and providing updates.¹⁰

Complementary Housing Programs

Host Housing Support Program

The Host Housing Support Program provides financial assistance to households offering housing to individuals and families displaced by the Maui wildfires. During the initial phase, qualifying host households can receive financial support of \$500 per person each month, depending on the size of the displaced family they are accommodating. Hosts may receive a monthly stipend of up to \$2,000, which can be extended for up to 6 months.¹¹ This program is funded by the American Red Cross and the Hawai'i Community Foundation (HCF) in partnership with the County and the Council for Native Hawai'ian Advancement (CNHA). The program has served over 30 households from the NCS program to date.

Kāko'o Maui Housing Program

The Council for Native Hawai'i and Advancement (CNHA) administers the Kāko'o Maui Housing Program.¹² CNHA launched a centralized housing website to help survivors find housing while also serving as a platform for property owners and managers to offer their properties to survivors. Hawai'i homeowners can assist those needing housing by offering spare rooms or living space, short-term rentals, long-term rentals, second homes, or accessory dwelling units (ADUs) for CNHA to lease. CHNA will sign a lease agreement directly with a survivor and work with survivors to determine how much they

⁹ <https://humanservices.hawaii.gov/dhs-announces-four-community-based-organizations-awarded-to-participate-in-the-disaster-case-management-program/>

¹⁰ <https://humanservices.hawaii.gov/state-of-hawaii-department-of-human-services-launches-disaster-case-management-program/>

¹¹ <https://www.hawaiiancouncil.org/hostfamily/>

¹² <https://dbedt.hawaii.gov/hhfdc/hawaii-fire-relief-housing-program/>



can afford and if they qualify for other forms of rental assistance such as FEMA or other philanthropic sources. The program has signed leases with over 68 households from the NCS program to date.

Temporary Assistance for Needy Families (TANF)

DHS, in partnership with Maui Economic Opportunity Inc., started the Maui Relief Temporary Assistance for Needy Families (TANF) Program on October 20, 2023, to provide up to four months of financial support for families directly affected by the wildfires. The program is designed to assist families with at least one dependent child. The Maui Relief TANF Program is separate from the ongoing TANF cash assistance benefit and has a different application process, eligibility criteria, and requirements. To qualify for the Maui Relief TANF Program, a family must have suffered property loss or damage or reduction of earnings or employment as a direct result of the emergency, have at least one dependent child in the family, and meet income eligibility guidelines.¹³ The program has spent about \$6 million dollars to serve over 1,000 families impacted by the disaster. The program is funded jointly through a federal block grant and private funds.¹⁴ The State has allocated up to \$100 million in funds for this resource.

Conclusion

The State is actively engaged in the process of transitioning the Non-Congregate Sheltering (NCS) population as expediently as possible into intermediate housing solutions. Continued collaboration from FEMA, the American Red Cross, and various State agencies and their contractors will be critical to expediting the transition of households from the NCS Sheltering locations to their intermediate or permanent housing solution. As intermediate housing solutions have become available over the past two months, the rate of decompression has notably increased. The State intends to continue this momentum, ensuring that individuals and families are offered solutions that meet their unique recovery needs.

¹³ <https://humanservices.hawaii.gov/blog/governor-green-announces-application-date-for-maui-relief-tanf-program/>

¹⁴ <https://www.meoinc.org/maui-relief-tanf-program-online-applications-will-open-friday/>



FEMA

May 6, 2024

MEMORANDUM FOR: William C. Hagmaier
Assistant Administrator
Recovery Directorate

THROUGH: Robert J. Fenton
Regional Administrator
FEMA Region 9


2024.05.07

FROM: Thomas J. Dargan
Federal Coordinating Officer
FEMA Region 9
FEMA-4724-DR-HI

**THOMAS J
DARGAN**
Digitally signed by THOMAS J
DARGAN
Date: 2024.05.06 13:19:18 -10'00'

Subject: FEMA-4724-DR-HI
Non-Congregate Sheltering
Request for Extension to June 10, 2024

Dear Assistant Administrator Hagmaier:

On **April 25, 2024**, the Hawaii Emergency Management Agency (HI-EMA), (Applicant), submitted a letter dated April 24, 2024, requesting a 30-day extension of Non-Congregate Sheltering (NCS) activities in Maui County from May 10, 2024, to June 10, 2024. Previously, on January 15, 2024, the Assistant Administrator of Recovery (AAR), approved NCS beyond the initial six-month Period of Performance (POP) from the major disaster's declaration date, through April 10, 2024. On April 5, 2024, in response to HI-EMA's March 1, 2024, request, the AAR extended the POP by another 30 days to **May 10, 2024**.

For the reasons discussed herein, I recommend the AAR authorize an extension for 30-days. Should concurrence be received, this time extension would authorize continued NCS eligibility through **June 10, 2024**.

The Applicant must adhere to, and is limited to, the approval criteria FEMA has provided in previous correspondence and the additional conditions presented below, unless stated otherwise. Any subsequent time extensions beyond this approved period would need to be submitted 7 days prior to this extension's authorized end date, by June 3, 2024, and must be routed to and authorized by your office.

Background:

On September 8, 2023, FEMA acknowledged and approved Hawaii's notice of NCS, initially

received on August 15, 2023, in a meeting with the Governor. HI-EMA's notice informed FEMA of the State's execution of NCS activities within counties designated under FEMA-4724-DR-HI to address the immediate sheltering needs of disaster survivors.

On June 28, 2022, FEMA issued a memorandum waiving the requirement in the Public Assistance (PA) Program and Policy Guide (PAPPG) Version 4, for Applicants to obtain pre-approval before conducting NCS activities in traditional settings. Under the June 28, 2022, memo, the Regional Administrator is authorized to approve NCS in 30-day increments for up to six months from the date of the declaration.

On August 16 and September 6, 2023, the 30-day incremental extension requirement for this event was waived and the deadline for providing the initial eligibility criteria to FEMA was extended through September 29, 2023, respectively. The latter has commonly been referred to as the "Safe Harbor" period. On September 8, 2023, the authorized period for NCS was extended until February 10, 2024. This initial approval letter was amended and superseded within FEMA's October 20, 2023, letter updating both NCS reporting and eligibility criteria, which set in place a daily reporting requirement to address data issues and improve the data match discrepancies experienced by Individual Assistance (IA) when processing the HI-EMA NCS household reports.

FEMA issued two additional correspondences on November 15 and December 31, 2023, addressing reimbursement criteria for households remaining in NCS to meet for continued reimbursement. Within each correspondence, FEMA issued restrictions and clarification on the impacts of the following on eligibility for PA reimbursement of households sheltered: duplication of benefits (insurance and IA programs), municipality habitability determinations, Section 425 Transportation Assistance, Direct Lease, and IA registration deadlines.

FEMA's current policy for NCS is set forth in the PAPPG V4 2020, p. 123, with some additional flexibilities implemented within the June 2022 Dr. Forbes Memo, issued following increased frequency and implementation of NCS. In general, FEMA limits any approval of NCS activities to that which is reasonable and necessary to address the needs of the incident (usually no more than 30 days). The RA may extend approval for NCS activities conducted for more than 30 days from the incident, but the Applicant is required to use data regarding the individuals and households sheltered to demonstrate the need for continued emergency sheltering. Time extensions beyond six months must be approved by the AAR.

Pursuant to the eligibility requirements outlined in FEMA's policies, the Applicant's previous POP time extension request for eligible costs associated with NCS activities was partially approved by the AAR through April 10, 2024. Subsequently, following the State's request for a second extension, the AAR extended the POP by 30 days to May 10, 2024. Approval letters were issued on January 15, 2024, and April 5, 2024, emphasizing prior conditions for eligibility and including additional conditions as comprehensively outlined in the "Reimbursement Criteria" section below.

Current NCS Participation Data:

Based on data previously reported in the State of Hawaii's prior request letters, the original population sheltered at the peak of NCS operations was more than 8,000 individuals comprising up to 3,100 households. In the May 5, 2024, HI-EMA Daily Data Report, FEMA was provided a list of

665 households, which was matched by FEMA on May 6, 2024, and is reported in the table below. FEMA’s data matching of this HI-EMA Daily Data Report resulted in 709 households, which represents the number of households confirmed to be registered under FEMA’s IA Program and in NCS on May 6, 2024. Based on the difference between the number of households reported and matched, 44 households are reflecting as duplicate FEMA registrations (two FEMA registrations to one Red Cross Household identifier). These 44 households are reflected as the difference between the “Red Cross Households Currently in NCS” and the “FEMA Registrations Matched to Households Currently in NCS” in this table.

Categories	# of Households
Red Cross Households Currently in NCS (Report Date: May 05, 2024)	665
FEMA Registrations Matched to Households Currently in NCS (Match Date: May 06, 2024)	709
FEMA Registrations Reimbursable	499
FEMA Registrations Non-Reimbursable	180
FEMA Registrations Pending (Licensed In to Direct Lease and within 7 days of their License In date)	30

Additionally, please note there are approximately 236 households currently sheltered within condominiums. Condominiums were approved as an eligible NCS setting only through April 4, 2024. To remain eligible following that date, households must have moved out of NCS condominiums and into approved forms of NCS (ie hotels).

Reimbursement Criteria:

Previous correspondence to the State, as outlined above, has stated that FEMA will not reimburse Emergency NCS costs for FEMA registrants if any of the following apply:

- FEMA has not been able to match the household to a FEMA-eligible registrant;
- The household does not meet general FEMA IA eligibility requirements, including registrant’s occupancy in an affected primary residence, registrant’s verified identity, and non-withdrawal of their IA application;
- No member of the household was registered with FEMA IA after the IA registration deadline of December 11, 2023, without sufficient justification for late registration;
- The registrant’s pre-disaster primary residence is safe to occupy and the registrant can return to their home;
- The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment, and has not demonstrated exhaustion of this benefit;
- Any member of the household has utilized Section 425 Transportation Assistance for air travel through FEMA;
- The household has obtained alternate temporary or long-term housing, to include placement through a voluntary agency;
- The registrant has previously vacated NCS and subsequently returned;

- The household has been licensed into a Direct Housing unit, or has been offered a Direct Housing unit and has declined for an unacceptable reason, per IA guidelines; or
- The Direct Lease eligible household fails to make reasonable efforts to move forward in the Direct Lease process, including required background checks.
- As grocery stores and businesses are now open, feeding and wraparound services not included within a standard hotel booking will no longer be reimbursable through FEMA PA funding.

HI-EMA Time Extension Request and Transition Plan:

To support HI-EMA's current NCS Time Extension request, they have cited their extensive efforts to decompress NCS through the NCS Transition Taskforce. Given the current NCS population, the State is not optimistic that they will be able to transition the total remaining population out of NCS by the May 10, 2024, deadline. As such, they are requesting an additional 30 days to continue their efforts.

The April 5, 2024, NCS extension approval to May 10, 2024, included the stipulation that the State must submit a plan to transition households from NCS into interim housing options, including FEMA IA Direct Housing or State/local housing solutions. This was provided on April 25, 2024, along with the NCS extension request.

HI-EMA has identified three transition pathways for the remaining NCS population:

- *State Interim Housing:* The State of Hawaii has provided financial support to an overall total of 203 households through the Rental Assistance Program (RAP), which is available for up to 12 months. Additionally, the State is pursuing two new housing developments:
 - Hale 'O Lā'ie, formerly known as the Haggai Institute, is scheduled to be ready for occupancy in May 2024. The facility is expected to house over 150 households.
 - The Kala'iola State Group Site is scheduled to be ready for transition in July or August 2024. The State and County plan to construct approximately 450 units on this site.
- *FEMA Direct Housing:* As of May 6, 2024, 360 households currently in NCS are eligible for FEMA Direct Housing and are awaiting their housing solution. Although FEMA Direct Lease units are offered to NCS households first, their unique circumstances have delayed identifying suitable housing units to license them in. Additionally, a total of 36 NCS households are on hold for the FEMA Group Site, Kilohana, which is scheduled to begin moving in households in October 2024. We expect that license-in of FEMA Direct Housing eligible NCS households will continue past May 10, 2024. As such, a 30-day NCS extension would allow additional time to complete the process.
- *Survivor Identified Solutions:* A total of 19 households currently in NCS have homes that are potentially habitable. As Maui County re-opens new zones for safe occupancy, the State is working with households to transition back home. The State is collaborating with non-profit partners, including American Red Cross, to provide financial assistance and supplies to complete minor repairs and cleaning necessary for re-occupancy of the home.

The State of Hawaii Department of Human Services (DHS) launched the Disaster Case Management Program (DCMP) on February 21, 2024. According to the State's extension request, 693 households have utilized DCMP services to date.

Transitional Sheltering Assistance:

The State's April 24, 2024, letter also requested the reactivation of Transitional Sheltering Assistance (TSA). The State's original TSA request was submitted on August 12, 2023, and was approved on August 24, 2023. Most TSA participants were transitioned from TSA to NCS in August and September 2023. The last night of stay in TSA was October 7, 2023, and TSA formally closed on that date.

We understand that FEMA HQ is assessing a list of potential Courses of Action (COA) for the population of households that are expected to continue to require NCS past June 10, 2024, due to a pending interim housing solutions (specifically FEMA Direct Housing). TSA may be included as a potential COA, although this would require waiving a substantial amount of TSA policy, if possible. We recommend holding the TSA request in abeyance until this analysis is complete and a viable COA is chosen.

Recommendation:

Based on these circumstances and my review of HI-EMA's request and supporting information, I believe that the Applicant request has justified a critical need for extending NCS activities beyond the current eligible POP of May 10, 2024. Therefore, I recommend the AAR authorize an extension of up to 30-days, through **June 10, 2024**. Concurrence for this extension period would require any requests for further extensions to be submitted with justification 7 days prior to the end of the currently proposed approval period, by June 3, 2024.

If you have any questions or need any additional information, please contact Thomas J. Dargan, Federal Coordinating Officer, at (330) 980-6646 or thomas.dargan@fema.dhs.gov.

Concur: **WILLIAM C HAGMAIER**
Digitally signed by
WILLIAM C HAGMAIER
Date: 2024.05.09
10:58:35 -04'00'
William C. Hagmaier
Assistant Administrator
Recovery Directorate

Non-Concur: _____
William C. Hagmaier
Assistant Administrator
Recovery Directorate

cc: Thomas J. Dargan, Federal Coordinating Officer, FEMA-4724-DR-HI
Joseph Engler, Director, Recovery Division, Region 9
Michael Gayrard, Public Assistance Branch Chief, Region 9
Jesus Ceja, Individual Assistance Branch Chief, Region 9
Christopher Ruley, PA Infrastructure Branch Director, FEMA-4724-DR-HI
Shahdy Monemzadeh, Individual Assistance Branch Director, FEMA-4724-DR-HI

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
ADMINISTRATOR OF EMERGENCY
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
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HONOLULU, HAWAII 96816-4420

May 17, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: FEMA-4724-DR-HI, Request for Extension of Non-Congregate Sheltering (NCS)

On May 6, 2024, the Assistant Administrator William C. Hagmaier, on behalf of the Federal Management Emergency Agency (FEMA), sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan in which FEMA authorized a time extension of Non-Congregate Sheltering (NCS) activities related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. The memorandum extended NCS to June 10, 2024. FEMA stated that any subsequent extension request must be made in 30-day increments submitted no less than fifteen days prior to the expiration of the previous extension.

HI-EMA continues to oversee NCS in accordance with FEMA's Public Assistance Program and Policy Guide (PAPPG) Version 4 and the policy described in the FEMA's "Emergency Non-Congregate Sheltering" memorandum, dated June 28, 2022.

Request for 30-Day Extension

In alignment with FEMA's requirements, the State of Hawaii Emergency Management Agency (HI-EMA) requests a 30-day extension of NCS to July 10, 2024.

The NCS Task Force has made significant strides by transitioning approximately 1,350 households out of NCS over the past three months. As of May 17, 2024, 510 households remain in NCS. Given that both FEMA and the State have faced challenges in identifying units for households with complex housing needs, it is not likely that all households will be transitioned to an intermediate solution by the current deadline of June 10, 2024.

The FEMA Direct Lease program is working on matching 308 Households in NCS with a housing unit. FEMA Direct Lease has struggled to find housing units for households with serious barriers to relocation, including dependence on medical care services based in the west side, access and functional needs, and children in Lahaina schools. Additionally, there are about 35 households who will be placed in the FEMA Group Site, which will not be available by the current NCS end date.

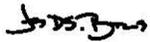
The State's Rental Assistance Program is diligently finding housing solutions for about 50 households in NCS. The RAP program faces similar challenges in identifying units near Lahaina that meet the access and functional needs of survivors who are unable to relocate away from west Maui.

Additionally, the State has been working through complicated case management challenges to vet households who might be able to receive housing through a linked FEMA Registration, or who are newly determined ineligible for FEMA Direct Lease. As FEMA determines households ineligible for their Direct Lease program over the next month, the state anticipates needing time to collect information through the established NCS Data Triage team and make referrals to the State's RAP program as necessary. This extension will enable the NCS Task Force time to find solutions for households with complex housing needs while decompressing the program at an expedient pace.

The State of Hawaii appreciates FEMA's continued partnership and commitment to the recovery of the survivors. Thank you for your consideration of this request.

If you have any questions or require additional information, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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May 22, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: FEMA-4724-DR-HI, Request for Individual Assistance supported Non-Congregate Sheltering (NCS)

HI-EMA continues to oversee NCS in accordance with FEMA's Public Assistance Program and Policy Guide (PAPPG) Version 4 and the policy described in the FEMA's "Emergency Non-Congregate Sheltering" memorandum, dated June 28, 2022. In a letter dated May 17, 2024, the State of Hawai'i (State) requested of FEMA to extend Public Assistance support for the NCS program for an additional 30 days, to July 10, 2024. This program, however, in current form is scheduled to end on June 10, 2024.

Currently there is a population of approximately 322 FEMA Direct Housing eligible households who are awaiting placement through Direct Lease or the FEMA group site which is under construction. Despite best efforts, there will likely be a gap in housing between the planned end of the NCS program and new housing units becoming available.

To ensure there is no gap in survivor housing the State requests that FEMA implement an Individual Assistance (IA) supported NCS program beginning on June 11, 2024, or at the end of the current NCS program.

Request for a FEMA Managed NCS program

It has been a struggle for FEMA Direct Lease to find sufficient housing units for households with serious barriers to relocation. Challenges preventing placement in Direct Lease include a lack of accessible units and functional needs, background checks, family composition, dependence on medical care services based on the west side, and children attending schools located in West Maui.

Additionally, there are currently 45 households awaiting placement in the FEMA group site currently under construction. This site, however, will not be ready to house survivors prior to the current end date of the state managed NCS program. Initial occupancy will likely be somewhere in the late October or early November 2024 timeframe.

Due to these placement and timing challenges the State requests that FEMA place this population into an Individual Assistance supported NCS program commencing at the end date of the current NCS program through November 30, 2024.

The NCS Task Force has made remarkable strides by transitioning approximately 1,375 households out of NCS over the past three months. As of May 22, 2024, 449 households remain in NCS. Given that both FEMA and the State have faced challenges in identifying units for households with complicated housing needs, it is not likely that all households will be transitioned to an intermediate solution by the current deadline of June 10, 2024.

In keeping with the precedent set with previous individual assistance programs, the state requests that FEMA cover 100% of costs associated with the NCS program similar to other FEMA managed programs such as FEMA Direct Housing or Transitional Sheltering Assistance.

The State of Hawaii appreciates FEMA's continued support, partnership, and commitment to the recovery of the disaster survivors. Thank you for your consideration of this request.

If you have any questions or require additional information, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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May 28, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: FEMA-4724-DR-HI, Request to Extend Non-Congregate Sheltering (NCS)
Condominium Use

This correspondence is in response to the Federal Emergency Management Agency (FEMA) letter dated April 5, 2024, regarding the State of Hawaii Emergency Management Agency (HI-EMA) request to extend Non-Congregate Sheltering (NCS) for the Maui Wildfires (FEMA-4724-DR-HI). The April 5th correspondence addressed the March 14, 2024, HI-EMA request which included the extension of the use of FEMA Public Assistance (PA) funding for Non-Congregate Sheltering (NCS) in apartments and condominiums. HI-EMA is requesting an extension of the condominiums through June 10, 2024.

Pursuant to the Public Assistance Program and Policy Guide (Version 4), HI-EMA is aware that the use of non-congregate sheltering is utilized by FEMA only in “limited circumstances, such as when congregate shelters are not available or sufficient”. The State appreciates FEMA’s flexibility to date in understanding the nuances of implementing a large-scale NCS program in an island setting. Accordingly, we are requesting reconsideration regarding the previously denied request based on the additional information provided. We are hopeful FEMA will agree that the use of condominiums continues to be a necessary and reasonable option.

NCS Funding for Apartments and Condominiums

The February 20, 2024, FEMA correspondence stated:

Considering the devastating impacts of the wildfires in Hawaii and the clear communication in the RA’s support for the State’s request, I approve the State’s request to use condominiums/apartments for the provision of PA-supported NCS and consider this memo to constitute DSG to the State. This approval is retroactive to August 19, 2023. The approval extends through 45 days after the end of the 6-month

initial Period of Performance, through April 4, 2024, for the purposes of transitioning survivors out of condominiums/apartments. During this time no new survivors placed into condominiums/apartments will be eligible for reimbursement, and the Applicant should revert all eligible NCS households to eligible NCS hotels beyond this date.

The HI-EMA request made on March 14, 2024, to extend the use of PA funding for condominiums and apartments for NCS through August 10, 2024, was denied by FEMA. In the denial FEMA concluded that “there is now a sufficient supply of available hotel rooms to meet the State’s NCS requirements.”

On April 11, 2024, FEMA provided a Power Point Presentation (PPT) stating; “As of April 5, 2024, 356 households remain in condos. The non-reimbursable cost per day is \$267,000 (\$750 per household per night).” Invoice records, however, show that condominium costs ranged from \$304 - \$595 per night, an average savings of approximately \$300 per household per night.

To demonstrate the cost effectiveness of the condominiums HI-EMA completed a cost analysis which included a sample of 25 households. Ten households were sheltered in condominiums and fifteen households were sheltered in hotels. A per person/per day cost rate was calculated by taking the total daily cost of sheltering the family and dividing by the number of household members sheltered. The costs of condominiums resulted in an average per person costs of \$154.25/day versus the costs of hotels which resulted in an average person cost of \$231.73 per day. This yielded a \$77.48 per person/per day difference between housing in condominiums vs hotels, a 33% difference between the costs of condominiums and hotels.

Cost/night	
Hotel	\$231.73
Condominium	\$154.25
Difference	\$77.48

Using FEMA’s statement that 356 households remain in condominiums as of April 5, 2024, as a cost comparison, the average hotel cost of \$231.73/night x 356 households remaining in condominiums = \$82,495.88. The average condominium cost of \$154.25 x 356 = \$54,513.00. This equates to a delta of \$27,582.88 savings per night. With 65 nights remaining to the June 10, 2024, NCS end date that equates to a saving of \$1,792,887.20 by using condominiums instead of hotels.

As the cost analysis demonstrates, the use of condominiums is a “least cost alternative” to the use of hotels and Airbnb’s as HI-EMA continues to transition survivors from NCS into temporary housing. Practically speaking, the current housing availability in Maui is still considerably limited and expensive.

Thomas J. Dargan
May 28, 2024
Page 3

As part of our cost analysis, HI-EMA also observed that there were instances where the classification of condominium and hotel invoices were misclassified. These inaccuracies may have led to inaccurate results in past estimates and in previous cost comparisons by FEMA.

In addition to the cost effectiveness of housing survivors in condominiums another major consideration is the psychological impacts on the survivors' mental health. Since the wildfires survivors have been dealing with considerable stress and the associated trauma of the event. This stress and trauma are further exacerbated by larger families being separated and placed into multiple hotel rooms. The alternative use of condominiums, where whole families are able to stay in one unit, that contain washer/dryers and adequate food storage, promotes and maintains a united family (ohana) which is sorely needed in their time of trauma.

HI-EMA appreciates FEMA's reconsideration regarding the matters outlined above as well as your continued efforts to help the survivors of the Maui Wildfires. Our staff is available to meet and discuss these matters further. Please contact Peter Kawamura, HI-EMA Public Assistance Project Specialist Lead at peter.kawamura@hawaii.gov or (808) 983-2546 for additional questions.

Sincerely,



JAMES DS. BARROS
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
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March 13, 2024

Thomas J. Dargan
Federal Coordinating Officer
Federal Emergency Management Agency
U.S. Department of Homeland Security

Regarding Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI

Dear Mr. Dargan,

On March 13, 2024, the County of Maui sent the State of Hawaii the Determination of Uninhabitable Residences due to the Maui Wildfires, FEMA-4724-DR-HI. While repairs are underway, the County has determined that many homes remain uninhabitable or restricted from access by previous residents.

All residential addresses attached to this letter are not habitable yet due to these on-going restoration efforts. Most of these uninhabitable residences are within an area that is designated for restricted local access only from 8 AM to 4 PM daily for area residents with a vehicle pass or ID to perform repairs or debris removal on their homes. Please review the attached letter "Determination of Uninhabitable Residences Wildfires, FEMA-4724-DR-HI" from the County of Maui for the specific areas with limited access. Many residences also face other challenges, such as a lack of clean water or sewer services. These residences will remain uninhabitable until access restrictions are lifted. The county does not have a timeline to lift restrictions identified yet.

The County of Maui classifies these specific residences as temporarily uninhabitable until health and safety issues are addressed and mitigated. FEMA's standard of habitability is based on the definitions of "safe," "sanitary," and "functional" in accordance with federal regulations (see 44 C.F.R. 206.117(2)(d)). Distillation of regulations and policy considers:

- Access to essential utilities, including:
 - Power
 - Gas
 - Water (pre-disaster municipal or well)
 - Sewer/water treatment (either pre-disaster municipal or septic)
- Physical road access

February 27, 2024

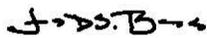
Page | 2

- Structural integrity of the primary dwelling

These same considerations have been factored into the determination by Maui County. Many of these uninhabitable residences have been deemed not reimbursable by FEMA due to a belief that the home is currently habitable. Considering the information provided by the County of Maui on March 13, the State requests that FEMA acknowledge that households on the attached list have been determined to be unsafe to occupy due to the event by the local jurisdiction and reimburse the State for their stay in an NCS shelter accordingly.

For additional details or inquiries, please reach out to Darrick Ching, NCS Task Force Lead, at 808-798-1804 or darrick.j.m.ching@hawaii.gov.

Sincerely,



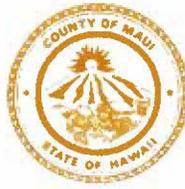
JAMES DS. BARROS
Governor's Authorized Representative

Attached: Determination of Uninhabitable Residences Wildfires, FEMA-4724-DR-HI (County of Maui; March 13, 2024) and

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director

KEANUKAPULANI S.K. LAU HEE
Deputy Managing Director



DEPARTMENT OF MANAGEMENT
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov

March 13, 2024

Mr. James DS. Barros, Administrator
Hawai'i Emergency Management Agency
4204 Diamond Head Road
Honolulu, Hawaii 96816-4420

**SUBJECT: Determination of Uninhabitable Residences
Wildfires, FEMA-4724-DR-HI**

Dear Mr. Barros:

The County of Maui is actively engaged in restoring critical infrastructure in the areas impacted by the Maui Wildfires. While repairs are underway, many homes remain uninhabitable or restricted from access by previous residents.

The residential properties listed in the attachment to this letter are not habitable despite on-going restoration efforts. The majority of these residences are within an area that is designated for restricted local access only from 8 a.m. to 4 p.m. daily for area residents with a vehicle pass or ID to perform repairs or debris removal on their home.

Areas with limited access as of March 8, 2024:

- Zone 1C
- Zones 2A-F
- Zones 3A-C
- Zones 4A-C
- Zone 5G
- Zones 6B-E
- Zones 7A-G
- Zones 8A-C
- Zones 9A-M, excluding Zone 9K
- Zones 10 A-E
- Zones 11A-F
- Zones 12A-B
- Zone 13D
- Zones 14C-D
- Zone 15A
- Zone 16A

Mr. James DS. Barros
March 13, 2024
Page 2

Many residences also face other challenges such as lack of clean water or sewer services. These residences will remain uninhabitable until access restrictions are lifted. The County of Maui has not yet identified a timeline for these restrictions to be lifted.

For additional details or inquiries, please contact me at Keanu.LauHee@co.maui.hi.us.

Sincerely,



Keanukapulani S.K. Lau Hee
Deputy Managing Director

Attached: List of Uninhabitable Residences

Households Determined to be Uninhabitable based on County Map

Data as of 3/11/2024

REGISTRATION_ID	APPLICANT_NAME	DD_ADDRESS	CITY	ZIP_CODE	Water_Zones	Water_Zones	Sewer_Service_Zones	Air	Access Limitations	Power	Reason Property not Habitable
414047570	CRISWELL II, ROSCOE	134 WAHE LN APT 207	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048108	BUTLER, PAUL	134 WAHE LN APT 304	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048277	PITTMAN, TIMOTHY	1497 AIKAKEA RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414050382	MUPAS, PEDRO	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414051254	PAGE, STEVEN	1500 LIMAHANA CIR APT E203	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414054092	NUNEZ PEREZ, EVA	853 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054554	COUTINO GUILLEN, ELAINE	853 KANAKEA LOOP UNIT 4	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054769	ARTHUR, GRAYSON	1579 LOKIA ST	LAHAINA	96761	2E	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414055682	GARGAN, KFFEE	127 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414057431	PANGILINAN, ALVIN	597 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059079	JEREMIAH, HENRY	927 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414059575	MOLINA, EDGARDO	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059938	LADOSI, IONELIA	420 ALO ST	LAHAINA	96761	13B	Area L-5	Inactive	Satisfactory	Closed	PENDING	Multiple Reasons, see red columns to the left for details
414061052	CEON, RAQUEL	262 KAHOMA VILLAGE PL APT 9-103	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414061515	FAITUA, HULITA	102 KAPUNAKEA ST # B	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414066781	STRAHE, JON	142 BAKER ST	LAHAINA	96761	8A	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414068149	GOMEZ VIGIL, PEDRO	624 KAHAKO ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414071854	WRIGHT, PALANI	269 KAHOMA VILLAGE LOOP APT 13-104	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414074807	IBALE, JULIEANNE	293 KAHOMA VILLAGE LOOP APT 17-106	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414079440	CASTRO, NORA	906 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414089411	INGAN, BEBERLY	597 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414092539	FONOHEMA, TRE	78 KAUJUALA RD	LAHAINA	96761	13B	Area L-5	Inactive	Satisfactory	Closed	PENDING	Multiple Reasons, see red columns to the left for details
414124445	ESPEJO, MARY JANE	584 KAHENA ST	LAHAINA	96761	9H	Area L-3A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414124614	EDLAD, ELIZABETH	736 PAUNAU ST	LAHAINA	96761	10E	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414125948	BALAGOS, RACHAEL	920 KOPILI ST	LAHAINA	96761	8C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445317266	GAZMEN, MARIENOR	618 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445320404	YOUNG, RYAN	105 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445326779	COUNTRYMAN, CHANDLER	20 KAI PALI PL	LAHAINA	96761	6B	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445339405	GANOY, CHERIELYN	932 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445341919	DUMLAO, ANGEL MAY	841 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445343967	VILLACASTEN, JEFFREY	88 KAPUNAKEA	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615732609	VALLEJO, LORNA	854 KANUIA ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615732680	LOUZON, LIOR	67 KANUIA PL	LAHAINA	96761	1C	Area L-1	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615741660	MALONEY, PAUL	268 KAHOMA VILLAGE PL # 8-105	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615747280	TAKATA, ALLAN	114 WAHUKULI RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615752222	MALAMALA, SIONE	1037 WAINES ST APT D19	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630021693	TAYLOR, CRISTINA	731 MILL ST APT A	LAHAINA	96761	10D	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630021747	COSTA, CATHY	604 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
630026231	DELATORI, DYLAN	1586 AIKAKEA RD ROOM 2	LAHAINA	96761	2B	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048036	WRIGHT, ALEXA	257 KAHOMA VILLAGE LOOP APT 11-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414048190	PASSAMONTE, PAUL	1300 LIMAHANA CIR APT C304	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414049427	HARRISSON, DUNCAN	45 E KUU AKU LN UNIT 306C	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414049587	HOSKINS, DIANA	1403 FRONT ST APT 402	LAHAINA	96761	4A	Area L-4C	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414051385	HOFFMAN, TODD	1276 NAHALE PL UNIT A	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414054368	ANDRES, MARY	571 KAPUNAKEA ST	LAHAINA	96761	9I	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414056014	TUPOLA, HENRIDENE	847 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414058839	GALOIA, POUSISMA	256 KAHOMA VILLAGE LOOP APT 10-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059015	PEREZ GALINDO, PABLO	134 WAHE LN APT 203	LAHAINA	96761	9A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414059891	AGONOV, MARCEL	1015 KANAKEA PL	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414060041	KEKAHUNA, SHAMRON	142 BAKER ST	LAHAINA	96761	8A	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414061489	GALAM, ABIGAIL	974 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414062471	AGDEPPA, DYLAN	896 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414063779	MARIANO, JANELLE	32 KAPUNAKEA ST	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414065506	VERSOJA, JONATHAN	1015 KANAKEA PL	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414069211	UMAYAM, JULIOTO	1588 AA ST	LAHAINA	96761	2D	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414070750	PRESTAGE, HALLEY	153 PUALEI DR APT 3	LAHAINA	96761	16A	Area L-5	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414081037	IBALE, FLORENZIA	293 KAHOMA VILLAGE LOOP	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414085297	CABANILLA, FLORENTINO	963 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414091263	RICARDO, RHEENA	615 KAHAKO ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414098467	SMITH, NOLLE	15 E KUU AKU LN UNIT 102	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414115396	GARCIA, KALEALANI	1037 WAINES ST APT D17	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414118717	SIMON, DEFLIA	906 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414130110	SAIOR, MAYDELYN	531 LAHANALUNA RD	LAHAINA	96761	9C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414133734	FRANKLIN, AAIINA	100 KENUI ST APT 110	LAHAINA	96761	7F	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445315321	KENIN, ERIN	232 MALANA ST	LAHAINA	96761	2F	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445315350	VAUDOUEY, TERENCE	603 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445316669	DRISCOLL, SUSAN	1660 LIMAHANA CIR	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445319719	BACLA, MARITES	31 E KUU AKU LN UNIT 214	LAHAINA	96761	5G	Area L-3B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
445330639	GONZALEZ GOMEZ, SAUL	268 KAHOMA VILLAGE PL # 8-102	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
445346194	KANINO, JOHN	615 KAHENA ST	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615729710	MURPHY, JESS	430 KAHOMA VILLAGE LOOP	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615745587	LATU, ANGLIELINE	917 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615749076	SCHULZ-PETERSON, DEBORAH	1300 LIMAHANA CIR # C102	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615750017	LANOZA, ELIZABETH	957 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615763870	CORDERO, MARLENE	1252 NAHALE PL	LAHAINA	96761	4C	Area L-4B	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
615814011	HINGANO, LIUKAI	767 LUAKINI ST APT 10	LAHAINA	96761	10A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
615885542	DURAN, ALANAROSE	287 KAHOMA VILLAGE LOOP # 16-103	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630017293	JARANILLO, JESSIE	1037 WAINES ST A22	LAHAINA	96761	7E	Area L-4D	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
630027320	McGREGG, MICHAEL	790 FRONT ST UNIT 1	LAHAINA	96761	10A	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414049386	KALEPA, FRANK	939 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
414058936	YAMADA, KIMBERLY	262 KAHOMA VILLAGE LOOP UNIT 9-106	LAHAINA	96761	6C	Area L-4D	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414064319	TAYLOR, KIANI	256 KAHOMA ST # 10-104	LAHAINA	96761	4C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414069014	POLISKI, ALYSSA	1300 LIMAHANA CIR APT C104	LAHAINA	96761	6D	Area L-4A	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414090501	TAGALOA, SAVAILI	603 KAHAKO ST	LAHAINA	96761	9M	Area L-6	Active	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414096496	REKDAHL, JACOB	1495 AIKAKEA RD	LAHAINA	96761	3A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414123007	CEBALLOS, LINDSAY	105 KANUIA RD	LAHAINA	96761	1C	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414124612	FINC, JASON	1329 KAHOMA ST	LAHAINA	96761	4C	Area L-6	Inactive	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
44535291	KRON, ROBERT	1474 MALO ST	LAHAINA	96761	2A	Area L-6	Non Sewer Area	Satisfactory	Local Access Only	PENDING	Multiple Reasons, see red columns to the left for details
414074614	MIRANDA, SASHA	963 KANAKEA LOOP	LAHAINA	96761	9M	Area L-2	Active	Satisfactory	Local Access Only	PENDING	Access Limited by County
41409061											



FEMA

June 8, 2024

MEMORANDUM FOR: Robert J. Fenton
Regional Administrator
FEMA Region 9

ATTENTION: Thomas J. Dargan
Federal Coordinating Officer
FEMA Region 9
FEMA-4724-DR-HI

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

PAUL C
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Date: 2024.06.08
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SUBJECT: State of Hawaii Emergency Management Agency (HI-EMA)
Requests to Extend Non-Congregate Sheltering (NCS)
FEMA-4724-DR-HI

This is in response to your memoranda dated June 6, 2024; regarding requests from HI-EMA (recipient) under FEMA-4724-DR-HI to extend the use of FEMA Public Assistance (PA) funding for Non-Congregate Sheltering (NCS), request Individual Assistance (IA) Supported NCS, and request for Transitional Sheltering Assistance (TSA) Reactivation. This memorandum only addresses the Non-Congregate Sheltering (NCS) request.

Due to the extenuating circumstances and the continued needs of the those in affected communities as communicated in the recipient's requests and based on Region 9's recommendations, I believe that the Applicant request has justified a critical need for extending NCS activities beyond the current eligible Period of Performance (POP) of June 10, 2024. Therefore, I authorize a final extension of 20-days, through June 30, 2024.

I will provide a separate response addressing the requests for IA Supported NCS and TSA Reactivation.

If you have any questions, please contact Robert Pesapane, Division Director for the Public Assistance Division via email at Robert.Pesapane@fema.dhs.gov.

Cc: Robert M. Pesapane, Director, Public Assistance, Recovery Directorate



FEMA

June 11, 2024

MEMORANDUM FOR: Robert J. Fenton
Regional Administrator
FEMA Region 9

ATTENTION: Thomas J. Dargan
Federal Coordinating Officer
FEMA Region 9
FEMA-4724-DR-HI

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

PAUL C
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PAUL C JUDSON
Date: 2024.06.11
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SUBJECT: State of Hawaii Emergency Management Agency (HI-EMA)
Requests for Direct Federal Assistance (DFA) & Activation of
Transitional Sheltering Assistance (TSA) for Non-Congregate
Sheltering FEMA-4724-DR-HI

This is in response to your memoranda dated June 6, 2024, regarding requests from HI-EMA (State) under FEMA-4724-DR-HI to extend state-managed Non-Congregate Sheltering (NCS), to implement another form of DFA NCS as well as to reactivate TSA. On June 8, 2024, FEMA granted the final extension for an additional 20 days of state-managed NCS, through June 30, 2024. FEMA also approves the request for alternate DFA NCS and denies the request to reactivate TSA.

There are currently 45 households awaiting placement in FEMA Direct Housing. The population awaiting placement is comprised of households with extenuating circumstances preventing them from matching with a direct lease unit appropriate for their needs. This population is therefore awaiting placement at a Group Site, and requires a sheltering solution from the end date of the state-managed NCS on June 30, 2024 until the Group Site is available.

The FEMA Group Site is scheduled to begin licensing in eligible households in late October 2024. It is cost-prohibitive for the current state-managed NCS contract to continue beyond the approved extension period for the 45 households awaiting a temporary housing unit at the Group Site. It is, however, beyond the State's current capacity to manage NCS without support. Therefore, it is reasonable and cost-effective for the State to receive DFA to provide sheltering resources for this population.

FEMA may provide DFA when a State or local government lacks the capability to perform or contract for eligible emergency work. 44 CFR 206.208; FEMA Public Assistance Program and Policy Guide v4 (June 1, 2020), at p. 88. Therefore, I am approving the DFA request and extension for the time needed to place the pre-identified population into the FEMA Direct

Housing Group Site. Specifically, I am authorizing the use of FEMA Headquarters contract resources to directly manage the remaining NCS operation on a cost share basis with the State. Eligible households will be required to transition from State-managed NCS to DFA NCS within 7 days of implementation, and the State will no longer be eligible for Public Assistance reimbursement for State-managed NCS.

Regarding the State's request to reinstate TSA, reinstatement of TSA would require several TSA policy waivers to continue sheltering the remaining population until the Group Site is available. Also, transitioning from NCS to TSA would place undue hardship on the survivors. Therefore, I am denying the request for TSA in lieu of approving the DFA request, as discussed above.

If you have any questions regarding state-managed NCS, please contact Robert Pesapane, Division Director for the Public Assistance Division via email at Robert.Pesapane@fema.dhs.gov.

If you have any questions regarding TSA and DFA NCS, please contact Frank Matranga, Division Director for the Individual Assistance Division via email at Frank.Matranga@fema.dhs.gov.

Cc: Robert M. Pesapane, Director, Public Assistance, Recovery Directorate
Tod Wells, Deputy Director, Public Assistance, Recovery Directorate
Frank Matranga, Director, Individual Assistance, Recovery Directorate
Elizabeth Asche, Deputy Director, Individual Assistance, Recovery Directorate
Zach Usher, Deputy Director, Individual Assistance, Recovery Directorate
Jesus Ceja, Branch Chief, Individual Assistance, Region 9
Shahdy Monemzadeh, Branch Director, Individual Assistance, DR-4724-HI
Victoria Crouse, Branch Chief, Mass Care, Voluntary and Community Services
Ronan Dalcross, Section Chief, Mass Care Emergency Assistance, Individual Assistance
Cindy Atkins, NCS Unit Lead, Mass Care Emergency Assistance, Individual Assistance

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
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4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

June 18, 2024

Thomas J. Dargan, Federal Coordinating Officer
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Request for DFA NCS for
FEMA Direct Lease Eligible Households
In State-Managed NCS
FEMA-4724-DR-HI

On June 8, 2024, FEMA granted the final time extension of state-managed NCS through June 30, 2024 related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. Subsequently, on June 11, 2024, the Assistant Administrator William C. Hagmaier, on behalf of the Federal Management Emergency Agency (FEMA), sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan. In this memorandum, FEMA authorized the transition of households in Non-Congregate Sheltering (NCS) eligible for the FEMA Group Site to transition to DFA (Direct Federal Assistance) NCS. FEMA denied the request to reactivate Transitional Sheltering Assistance (TSA).

HI-EMA supports FEMA's authorization of FEMA resources via DFA NCS on behalf of the survivor households awaiting placement at the FEMA Group Site. The direct federal assistance provided through this extension will provide continuity of services for these households before FEMA licenses them into the Group Site.

Request for DFA NCS for Households in State-Managed NCS

In the June 11th memorandum, FEMA limited the transition to the survivor households eligible for the Group Site. HI-EMA requests that FEMA transition all remaining NCS households to DFA NCS.

Although HI-EMA will continue to work with FEMA through the placement of the households eligible for Direct Lease, HI-EMA requests that FEMA transition these households to DFA NCS in alignment with the recent authorization of the FEMA Group Site households. Both groups of households (i.e., those waiting for placement in the Group Site and those waiting for placement in a Direct Lease unit) are eligible for FEMA Direct housing assistance. In addition, both groups

remain in NCS because they are awaiting the transition into the FEMA Direct Housing unit offered. The following sections of this memorandum further describe HI-EMA's justification for this request.

Eligibility of Direct Lease Households for DFA NCS

The households eligible for the FEMA Group Site and the households eligible for FEMA Direct Lease were assigned to their respective pathways by FEMA. These households did not voluntarily opt for one Direct Housing solution over another. As a result, the timing of the placements for these households is outside of the survivor's and the State's control. HI-EMA does not see a meaningful distinction between these households in regard to the need for NCS sheltering, or eligibility for Direct Housing assistance.

Per FEMA's letter, FEMA anticipates that the FEMA Group Site will begin licensing in eligible households in October 2024. According to FEMA, "It is cost-prohibitive for the current state-managed NCS contract to continue beyond the approved extension period for the 45 households awaiting a temporary housing unit at the Group Site. It is, however, beyond the State's current capacity to manage NCS without support. Therefore, it is reasonable and cost-effective for the State to receive DFA to provide sheltering resources for this population." HI-EMA agrees and requests that FEMA consider the applicability of this statement to the households remaining in NCS that are waiting for placement in a Direct Lease unit by FEMA.

Timing of Direct Lease Placements

As of June 18, 2024, HI-EMA estimated that FEMA averages a rate of licensing-in 4.5 households per day and there are 95 Direct Lease eligible households in NCS. It is unlikely that FEMA will be able to place all Direct Lease eligible households by June 30, 2024. Accordingly, HI-EMA requests that FEMA serve survivors who are currently sheltering in the NCS program through DFA NCS.

Challenges to Direct Lease Placements

According to the Department of Housing and Urban Development's (HUD's) draft DR-4724-HI Housing Impact Assessment, Direct Lease has provided up to 400% of HUDs Fair Market Rent. Per the report: "These subsidized rental rates represent a significant increase in rental costs/payments and may have a long-term detrimental impact on the rental market. Historical housing data suggests that once rents go up, it is unusual to see them decrease without some seismic changes in the rental market and/or economy." HI-EMA and FEMA have previously acknowledged in prior memorandums the challenges in the local rental housing market that were exacerbated by the disaster. As a result, FEMA may require weeks or even months to find a suitable Direct Lease unit for the remaining population of state-managed NCS.

Several of the households remaining in NCS present complex housing needs that will make it more difficult for FEMA to place the households in Direct Lease by the current end date of June 30th. For example, households may require allowable accommodations related to medical, accessibility, or childcare needs. As a result, it is unlikely that all Direct Lease eligible households will be placed prior to the current end date of state-managed NCS.

June 18, 2024

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Limitations of State Resources

HI-EMA procured the American Red Cross (ARC) to support in the implementation of NCS. In particular, ARC has played an active role in communicating with households in NCS and transitioning them to interim housing. HI-EMA aligned the end of the ARC contract with the current end date of state-managed NCS on June 30th.

If the Direct Lease eligible households are not transitioned to DFA NCS, HI-EMA does not have the internal capacity or another vendor identified to replace ARC's role in the sheltering program, including survivor coordination, case management, hotel reservation management and accounting, interim housing coordination, or data reporting. Accordingly, HI-EMA requests that FEMA relieve the State of the associated reporting requirements currently fulfilled by ARC until FEMA is prepared to initiate and manage DFA NCS.

Conclusion

As HI-EMA projects that a sheltering need remains for Direct Lease eligible households beyond the currently approved deadline for state-managed NCS, HI-EMA requests that FEMA meet this need through DFA NCS for the following reasons. The households are eligible for DFA NCS;

- Placements for FEMA Direct Lease will likely extend beyond the end date of NCS;
- FEMA has faced and will continue to face challenges in placing these households by the end date of NCS; and,
- The State has limited resources to continue extensions of NCS.

In addition, HI-EMA requests that FEMA provide a forecast for upcoming placements in FEMA Direct Housing. This forecast will enable HI-EMA to identify the length of the sheltering period for the remaining NCS households.

Due to the time-sensitive nature of this request, HI-EMA requests a response to this memorandum by Tuesday, June 25, 2024.

If you have any questions or require additional information, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,



James DS. Barros
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII

**DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA**

OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

June 21, 2024

Thomas J. Dargan
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: Insurance Coverage for Households in Non-Congregate Sheltering (NCS)

Introduction

The State of Hawaii Emergency Management Agency (HI-EMA) previously provided memoranda to the Federal Emergency Management Agency (FEMA) about households in state-managed Non-Congregate Sheltering (NCS) with Additional Living Expenses (ALE) and Loss of Use (LOU) coverage for their pre-disaster residence. In particular, this topic was addressed in the following documents:

- HI-EMA's February 9, 2024 letter under the subject "Setting a threshold for Additional Living Expenses (ALE) benefits in duplication of benefits determination"
- HI-EMA's February 27, 2024 letter under the subject "Further Consideration for Additional Living Expense/Loss of Use (ALE/LOU) Insurance Coverage for Eligible Applicants to Alleviate Duplication of Benefits"

FEMA has not yet replied to either communication; however, this topic has been subject to an ongoing discussion with FEMA, and HI-EMA has concerns about the following actions taken by FEMA:

- (1) FEMA has identified households as non-reimbursable for state-managed NCS based on potential Duplication of Benefits (DOB) with insurance ALE/LOU coverage.

- (2) FEMA has indicated that households in state-managed NCS may not be transitioned to FEMA's Direct Federal Assistance (DFA) NCS based on potential DOB with insurance ALE/LOU coverage.

HI-EMA's Request

HI-EMA maintains that households that have or may have access to ALE and/or LOU insurance coverage, do **not** present a duplication of benefits for non-financial sheltering resources provided in state-managed NCS or FEMA's forthcoming DFA NCS.

HI-EMA requests that FEMA reimburse the State for state-managed NCS costs that have been established to provide for public safety, including for households that have or may have access to ALE/LOU coverage. Further, HI-EMA requests that FEMA include this population in the transition to DFA NCS, assuming they would otherwise be considered for the transition to DFA NCS.

FEMA Sheltering Programs

In FEMA's Public Assistance Program and Policy Guide (PAPPG), an evaluation of DOB is not listed as a criterion for eligibility. The impact of potential DOB on eligibility for FEMA assistance provided to individual and households is outlined only in FEMA's regulations (44CFR) under financial assistance being provided directly to disaster survivors.

The "Emergency Non-Congregate Sheltering" memorandum issued by FEMA's Assistant Administrator Melissa K. Forbes on June 28, 2022, FEMA describes the specific criteria to determine eligibility for NCS costs beyond the first 30 days and states that each household must:¹

- Be in an area declared for Individual Assistance (IA);
- Be registered with IA for disaster assistance;
- Have not requested to withdraw its IA registration;
- Be able to document pre-disaster status as an owner or renter of the primary residence; and,
- Have their primary residence determined not to be habitable.

FEMA does not include an evaluation for DOB in the eligibility criteria provided to manage NCS programs. Further, FEMA states their expectations for data reporting related to reimbursement for these program costs, including the following data points:

- FEMA IA Registration ID (if available)
- Head of household: First and last name and phone number (mobile or other)

¹ https://www.fema.gov/sites/default/files/documents/fema_memo-emergency-non-congregate-sheltering.pdf

- Number of individuals in the household
- Damaged dwelling: Street Address, City, State, Zip Code
- Pre-incident residence habitability status

Again, FEMA does not include insurance settlement amounts or awards as a needed data point within the authorization to administer NCS programs. As a result, HI-EMA asserts that an assumed or potential DOB for ALE or LOU coverage is an insufficient reason to determine a household as non-reimbursable for NCS.

In a letter dated January 15, 2024, FEMA Federal Coordinating Officer Thomas J. Dargan included a list of reasons for which FEMA will not reimburse NCS costs. This list included: “the registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment and has not demonstrated exhaustion of this benefit.” FEMA further stated that this list “is not exhaustive and does not amend previous guidance.” Although this letter states that FEMA does not consider costs related to these households reimbursable, HI-EMA maintains that these households should be reimbursable based on existing FEMA guidance (policy and regulation) and the intent identified in the letter that the letter does not amend previous guidance or supersede posted regulations or policies. The January 15th letter does not reference any policy or regulatory position for introducing this new criteria.

As the recovery process progresses, FEMA Housing Assistance becomes available. At this stage, the consideration of insurance proceeds becomes crucial in determining DOB. This critical juncture is explicitly addressed in FEMA's regulatory framework under Individual Assistance and Financial Assistance sections. (“financial assistance” being help in the form of dollars paid directly to eligible survivors as compared to “direct assistance” being help in the form of physical resource provided, often at greater expense, when financial assistance alone would not solve the housing needs of the survivor.)

It is important to highlight that certain forms of FEMA assistance, particularly those designated as last resort and subject to stringent eligibility criteria, such as FEMA Direct Housing, do **not** automatically disqualify applicants solely based on insurance payouts. **This policy is grounded in practical necessity: the mere possession of insurance funds does not equate to resolved housing needs without a corresponding physical resource for utilization.** Lack of physical resources available in proximity to the disaster area one of the key factors in the creation of the state-managed NCS program and one of the factors considered in FEMA’s approval of the state-managed NCS program.

Therefore, to argue that insurance is duplicative for sheltering or direct housing assistance undermines the logical sequencing and intent of FEMA's assistance framework. **More directly: having a check in one’s possession does not equate to having a physical resource available to meet a sheltering or housing need without State or FEMA intervention, which is a fact already well-documented in FEMA’s approval and execution of direct housing options (direct lease, direct housing units, and alternate housing unit group site creation- for which**

FEMA does not automatically exclude survivors who have insurance settlements that do not fully help them achieve safe housing). The aim is not to penalize survivors for having insurance coverage but to ensure that all available resources are effectively coordinated to meet the diverse and evolving needs of disaster-impacted individuals and communities.

FEMA Housing Programs

As noted in the previous section, FEMA does not explicitly require a DOB evaluation for NCS. By contrast, FEMA considers DOB when determining housing assistance and applies it most strictly when granting financial awards with the assumption that in such cases additional funding helps the applicant solve their housing need. It does not use an insurance settlement as a form of disqualification in all cases relating to applicant who have access to funding as the funding alone will not help them solve their housing challenge. **This is not inconsistent with the need to create NCS to secure and make available sheltering space that would otherwise not be available to disaster survivors.**

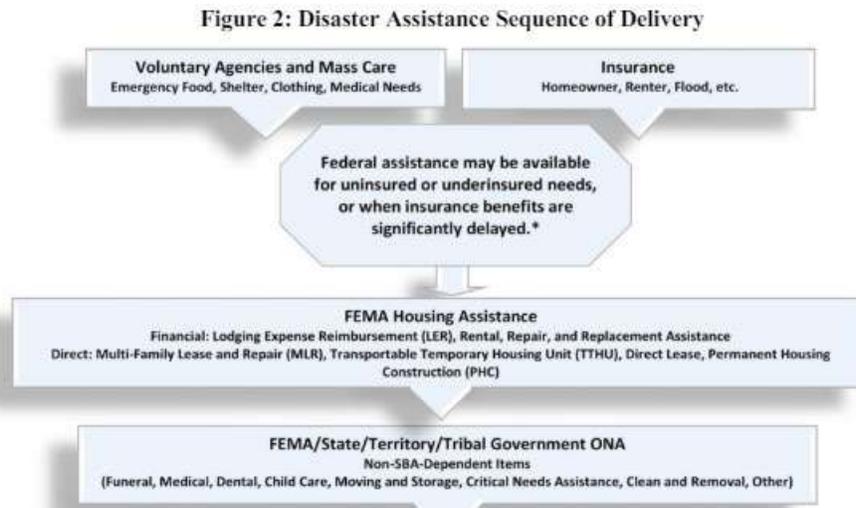
The Individual Assistance Program and Policy Guide Version 1.1. states that the following general conditions must be met for an applicant to be eligible to receive IHP assistance:²

- The applicant must be a U.S. citizen, non-citizen national, or qualified alien.
- FEMA must be able to verify the applicant's identity.
- The applicant's insurance or other forms of disaster assistance received cannot meet their disaster-caused needs.
- The applicant's necessary expenses and serious needs are directly caused by a declared disaster.

As represented clearly in the third bullet point, FEMA notes explicitly that “the applicant’s insurance, or other forms of disaster assistance received, cannot meet their disaster-caused needs” as a condition.

² https://www.fema.gov/sites/default/files/documents/fema_iappg-1.1.pdf

Figure 2 shows the sequence of delivery after a disaster.



In accordance with FEMA's Individual Assistance Program and Policy Guide (IAPPG), Figure 2 delineates the sequential provision of assistance to disaster survivors. Notably, sheltering and insurance assistance are often provided concurrently during initial stages of relief efforts. This simultaneous provision underscores a fundamental point: insurance should not be conflated as duplicative during the sheltering purposes but should be considered in subsequent forms of financial assistance.

Impacts on the State-Managed NCS Population

In a letter dated June 11, 2024, Assistant Administrator William C. Hagmaier, on behalf of FEMA, sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan. In this memorandum, FEMA authorized the transition of households in state-managed NCS eligible for the FEMA Group Site to transition to DFA NCS.

In a letter dated June 18, 2024, HI-EMA requested that the FEMA extend this transition to include all households in NCS that are eligible for FEMA Direct Housing. HI-EMA has yet to receive a response to that request. HI-EMA has included this population in this memorandum pending FEMA approval.

Survivor households (in NCS) that are eligible for FEMA Direct Housing, including FEMA Group Site and FEMA Direct Lease, typically fall into one of the following scenarios.

- 1. Households to Provide Insurance Funds to FEMA through the Direct Lease*

In multiple cases, households entering FEMA Direct Lease have provided FEMA with funding they have received from ALE/LOU coverage.

FEMA should not withhold reimbursement from the State (for state-managed NCS) if the household provided the insurance funds and documentation to FEMA (e.g., for Direct Lease). These funds should not directly impact the reimbursement of the sheltering costs regarding Public Assistance. The survivor has demonstrated need for both sheltering and assistance. Should funds be provided to FEMA for Direct Lease, these stated funds will be utilized and exhausted on the household's ongoing housing needs. This leaves the State unable to recoup the funding from the household, should those funds have been collected by FEMA. Should the survivor household not use insurance funds received for their sheltering needs. HI-EMA maintains that the households are reimbursable for state-managed NCS and may be transitioned to DFA NCS until placed by FEMA.

2. Households with ALE/LOU Coverage & Unable to Secure Housing

In multiple cases, households have been unable to utilize their ALE or LOU funds to secure an adequate housing solution.

FEMA and HI-EMA have acknowledged in prior memoranda that DR-4724-HI exacerbated the continued rental housing shortage. Households have been unable to find fair market rate housing options, even with financial assistance provided by insurance coverages. In multiple cases, households had no other choice but to accept shelter from state-managed NCS and rely on ALE/LOU coverage to meet basic necessities.

Given that the insurance funds did not meet the survivors' sheltering needs, the coverage should not be considered a sole justification for the lack of reimbursement through FEMA Public Assistance or an obstacle to transitioning these households to DFA NCS.

Households prevented from entering the DFA NCS program before they are transitioned to Direct Lease will likely face homelessness or critical housing instability as a result of the lack of available housing units on Maui. It is highly unlikely that resources available under the NCS program would have been available to individual's survivors in sufficient quantities if not for the creation of the NCS program. It is also unlikely at this time that an insurance company will provide adequate resources in a timely fashion to allow a household to find suitable housing before the end of the stated end of NCS program or before FEMA is able to provide a Direct Lease unit. This challenge is clearly visible to FEMA in its effort to place households in Direct Lease units who would face insurmountable challenges in obtaining units if they were expected to find housing units using financial assistance alone. The same consideration should be given to these exact same circumstances in while in the NCS, and in many cases **are the exact same households.**

3. FEMA Has Not Determined ALE or LOU Coverage for Households

In other cases, households are identified as potential ALE/LOU recipients because their type of coverage is either unconfirmed or the amount of coverage is unconfirmed by FEMA. As FEMA and partner agencies work to collect and validate documentation on insurance coverage, these populations still require sheltering assistance. As a result, HI-EMA does not consider this to be a sole justification for the lack of reimbursement through FEMA Public Assistance or an obstacle to transitioning these households to DFA NCS.

Conclusion

Based on the policies provided by FEMA, researched independently, and regulations referenced in this memorandum, HI-EMA maintains that insurance coverage, including ALE and LOU coverage, does not present a duplication of benefits for sheltering provided under the state-managed NCS or FEMA's forthcoming DFA NCS.

As a result, HI-EMA requests that FEMA consider these households as reimbursable for state-managed NCS and that FEMA transition these households to DFA NCS, assuming they would otherwise be considered for the transition to DFA NCS. FEMA can subsequently apply duplication of benefits calculations as per its regulation to housing programs as appropriate without creating an unnecessary gap in assistance for Hawaii's disaster survivors.

Sincerely,



James DS. Barros
Governor's Authorized Representative

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



MAJOR GENERAL KENNETH S. HARA
DIRECTOR OF EMERGENCY MANAGEMENT

JAMES DS. BARROS
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STATE OF HAWAII
KA MOKU'ĀINA O HAWAII

**DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA**

OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT
4204 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4420

June 26, 2024

Thomas J Dargan
FEMA-4724-DR-HI
Federal Emergency Management Agency
U.S. Department of Homeland Security

Subject: FEMA Direct Lease Households without an Interim Housing Solution at Non-Congregate Sheltering Program End

On June 8, 2024, the Federal Emergency Management Agency (FEMA) granted the final time extension of state-managed Non-Congregate Sheltering (NCS) through June 30, 2024, related to the FEMA-4724-DR-HI Hawaii Wildfires Major Disaster Declaration. Then, on June 11, 2024, the Assistant Administrator William C. Hagmaier sent a memorandum to Regional Administrator Robert J. Fenton and Federal Coordinating Officer Thomas J. Dargan on behalf of FEMA. In this memorandum, FEMA authorized the transition of households in NCS eligible for the FEMA Group Site to transition to DFA (Direct Federal Assistance) NCS.

Following FEMA's letter, the State of Hawaii Emergency Management Agency (HI-EMA) received a request from FEMA regarding households that are currently in NCS and eligible for FEMA Direct Housing. FEMA requested that the State of Hawaii (State) establish a temporary State sheltering solution for these households until FEMA can transition them to a Direct Lease unit.

As of June 25, 2024, there are 45 households eligible for FEMA Direct Lease. However, FEMA has not yet licensed in these households. Based on the current rate of decompression (estimated at 5 households per day for the FEMA Direct Housing population), it is unlikely that FEMA will license-in all of these households by the current end date of state-managed NCS on June 30, 2024.

The 45 households include:

- Three (3) households that have not yet been matched
- 42 households have been matched and do not yet have licensed in dates.
 - A number of these households have reported Access and Functional Needs (AFN)

HI-EMA is concerned about moving households from NCS to a State sheltering solution (before placement in their FEMA unit) for the following reasons:

- HI-EMA has consulted with partner state agencies and determined that the State does not have a viable solution to this request without disrupting household placement in State solutions.
- HI-EMA has learned that the State will not be able to adequately accommodate households with AFN needs at the new State site (Hale 'O Lā'ie).
- HI-EMA and state partners are concerned that moving households from NCS hotels to a State solution and, later, to a FEMA unit, may further exacerbate the stress on the survivors households.

As an alternate plan, HI-EMA proposes that these households remain in their current NCS hotels. To implement this plan, HI-EMA requests:

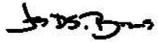
1. FEMA commits to a time frame for the period of time required for FEMA to license in the survivors.
2. FEMA commits to continue the 90/10 cost share to the State for these households.
3. FEMA commits to approve of the state running a program similar to NCS to cover the additional time FEMA expects will be required to complete placement of FEMA housing eligible survivors.

The State continues to assert that in the best interest of the survivor, we continue to provide NCS hotels until FEMA is ready to license them in. The State believes that this solution is the most trauma-informed option and is consistent with the National Disaster Housing Strategy and a survivor centric approach, as it avoids placing undue stress, hardship, and additional move onto the survivor. However, the State will continue to work with FEMA if that approach is not authorized by FEMA. As of June 25, 2024, the State's only available option is to place certain eligible households at the State's Hale 'O Lā'ie site and to seek more cost-prohibitive solutions to adequately accommodate families known to have access, functional, and other needs that Hale 'O Lā'ie cannot accommodate. Some State partners have raised concern about placing these households in State solutions. In prior disasters, FEMA has recognized the potentially adverse economic and social effects of similar sheltering solutions.¹

¹ Slinker, Jeremy. C. (2022, September 23). *FEMA-DR4663-DR-KY-Non-Congregate Sheltering Extension Request*.

As this is a time sensitive matter, the State requests a reply from FEMA before Close of Business tomorrow, June 27th, 2024. If the State does not receive a reply, the expectation will be to pursue the plan outlined in this letter, as it is in line with prior FEMA statements and conversations. If you have any questions or require additional information, please contact Darrick Ching, HI-EMA, NCS Task Force Lead, at darrick.j.m.ching@hawaii.gov or (808) 798-1804.

Sincerely,



James DS. Barros
Governor's Authorized Representative



Appendix E

Housing Memorandum of Understanding



Interim Housing Memorandum of Understanding

Between

County of Maui

and

State of Hawaii

and

Federal Emergency Management Agency

and

Council for Native Hawaiian Advancement

and

Hawaii Community Foundation

and

American Red Cross

This non-binding Memorandum of Understanding (“MOU”) effective as of January 5, 2024, is made by and between the County of Maui (“COM”), State of Hawaii (“SOH”), Federal Emergency Management Agency (“FEMA”), Council for Native Hawaiian Advancement (“CNHA”), Hawaii Community Foundation (“HCF”), and American Red Cross (“ARC”), and sets forth the terms and understanding between the parties regarding mutual efforts to secure interim housing for the survivor families of the Maui 2023 wildfires.

BACKGROUND

The severity and complexity of the impacts caused by the fires of August 8th (the “Fires”) on the people and place of Maui are unprecedented. Immediately following the Fires, the world galvanized around the communities of Lahaina, Olinda, and Kula in hopes of bringing stability and hope for those individuals and families impacted. Since then, hundreds of millions of dollars from government, public and private sources flowed into Maui. It is estimated that nearly 12,000 residents of Maui were directly impacted by the three fires.

Families who lost their place of residence seek housing stability over the next 18-24 months as work is completed to allow the physical rebuilding to begin. Today, over 2,700 households (estimated 6,200 individuals) remain housed in more than 30 hotels throughout Lahaina and Ka’anapali and an additional 1,500 households (estimated 4,000 individuals) are residing on neighbor islands. Included in this population are more than 300 undocumented individuals and

Compacts of Free Association (COFA) migrants and more than 150 previously houseless individuals.

In addition to Federal, State, and County efforts, many organizations and individuals stepped up to meet the immediate needs of Maui. Specific to this interim housing MOU, the support provided by the hospitality industry since the Fires has been timely, collaborative and extremely resourceful. They remain a very important partner as we transition families from non-congregate shelter to interim safe and stable housing. In addition, families throughout Hawai'i have opened their homes to house those in need. Adding to the effort, non-profits, private companies, and philanthropists from around the world lent their support of time, talent, and treasure to help in the recovery.

Based on currently known data, approximately 2,600-3,000 families are in need of interim housing that will provide a home for the next 18-24 months ("Interim Housing"). As many current hotel agreements for housing families expires in February 2024, the Parties have set a goal of having interim housing solutions to these families beginning March 1, 2024. It is recognized that some of these solutions, especially new construction solutions, may not be completed by that deadline, and that the Parties will continuously, and in a coordinated manner, monitor the solutions and needs.

This effort to provide Interim Housing will follow certain key principles. While the focus is on Interim Housing solutions, in order to minimize disruption to families and maximize use of resources, all efforts and decisions will prioritize:

- Sense of urgency away from non-congregate shelters;
- Return to residence (with full cooperation from families);
- Interim new builds that can also serve as Permanent; and
- Cost efficient options to ensure funds can be used to fund other important wrap-around (mental health, transportation, other household) or separate needs (education, workforce, etc).

PARTIES TO THIS MOU:

Maui County:

Per the FEMA National Disaster Recovery Framework (NDRF), *"the local government has primacy in preparing for and managing the response and recovery of its community. Individuals, families and businesses look to local governments to articulate their recovery needs. The local government leads pre-disaster recovery and mitigation planning efforts and has the primary role of planning and managing all aspects of a community's recovery post-disaster."*

Accordingly, the County of Maui, under the leadership of Mayor Richard Bissen, is the lead agency in disaster recovery efforts that directly affect Maui. Accordingly, they are primarily responsible for securing safe housing options in emergencies and disasters, with the support of the State, Federal, private and philanthropic technical and financial resources.

State of Hawai'i:

Also per the NDRF, *“States assist local governments post-disaster by identifying, securing, and leveraging recovery resources and funds for local governmentsIn addition to managing federally provided resources, state governments may develop programs or secure funding that can help finance and implement recovery projects. States may also enact new or existing exemptions to state laws and/or regulations to facilitate rebuilding activities and promote safe, stronger, and smarter building and oversee volunteer and donation management in coordination with Federal partners, including FEMA Voluntary Agency Liaisons.”*

Accordingly, the State of Hawaii, under the leadership of Governor Josh Green, is the primary supporting agency for Maui County Recovery efforts and seeks to jointly develop programs that meet Maui County objectives, particularly in the area of housing, and more importantly secure funding and regulatory variances toward that end.

The State of Hawai'i has established several disaster housing programs for survivors to find safe, secure, and stable housing including: the Hawai'i Fire Relief Housing Program, the State Department of Human Services Airbnb Program, and the Pu'uhooua o Nene Pre-Disaster Houseless Village in partnership with the State Department of Human Services and Project Vision Hawai'i. These programs have evolved from the beginning of the housing mission and will continue to meet the needs of disaster survivors in collaboration and cooperation with all partners.

Federal Government:

Federal Government supports in both emergency response and recovery efforts include a priority for safe shelter and housing. FEMA and the U.S. Department of Housing and Urban Development are the key federal agencies that support a disaster affected community and local government in the area of emergency, temporary and permanent housing.

Accordingly, for eligible survivors, FEMA has been and will continue to be a primary provider and funder of emergency and temporary housing options, among other housing-related supports.

Non-Governmental Organizations (NGOs):

Per the NDRF, *“NGO support is provided by a range of organizations from small community-based nonprofits to national organizations with extensive experience in disaster response and recovery.”*

NGOs play a wide range of roles in the response and recovery efforts. Because of that, the depth of understanding of individual and collective situations that should inform interventions and resources is extremely valuable.

“NGOs play a critical role in the implementation of an inclusive, locally led recovery organization and planning process.”

The **Council for Native Hawaiian Advancement (CNHA)** is a party to this MOU because of the key role it has and will continue to play in housing Maui families and well as serving as a key data partner for housing. To date, CNHA has played the following roles:

- Direct navigator support to survivors at the Kako'o Maui Resource Hub
- Provider of innovative temporary housing options consolidated at a centralized website:
 - Founder and operator of the Host Family program
 - Home leasing program (Property owner leases to CNHA who subleases to survivor family)
 - Loan Forgiveness program for county-approved accessory dwelling units (ADU)
- Data aggregator for survivors (FEMA, Red Cross, Kako'o Maui, and others)

The **Hawaii Community Foundation (HCF)** has provided technical and financial resources devoted to all 4 phases of disaster. Most significantly, for the Maui wildfire, the Maui Strong Fund (MSF) has been established to support all phases, with safe and secure housing a significant priority. Additionally, opportunities to fund high impact funding gaps and leveraging other sources of funds aligned with the intent of donors is an important objective of the MSF.

The **American Red Cross (ARC)** is a key NGO in all disaster response and recovery and has provided case management and funding support for survivors from the time the disaster hit to now. They have been an integral partner in housing strategies like the non-congregate shelter (NCS) and the Host Family program with CNHA.

The magnitude of need and complexity of the disaster requires collaboration, trust, strategy and structure to give affected families the greatest opportunity for success. Therefore, key stakeholders have joined together under this MOU to commit to this initiative.

NOW THEREFORE, the Parties agree as follows:

I. ROLES AND RESPONSIBILITIES

While the parties agree that this Interim Housing Plan and the work therein will be a collective effort, the section sets forth the understanding of projects and efforts that each party will lead.

See Exhibit A

II. FUNDING

This Interim Housing Plan establishes an ambitious goal of delivering up to 3,000 safe and stable homes for up to two years beginning March 1, 2024. To accomplish this, the estimated financial need is \$500,000,000 over the two years.

The parties have set forth an approximate allocation of those costs as:

Federal Emergency Management Agency (FEMA)	\$250,000,000
State of Hawai'i (SOH)	\$150,000,000
County of Maui (COM)	\$ 40,000,000
Hawaii Community Foundation MSF	\$ 50,000,000
CNHA, Kāko'o Maui Fund	\$ 5,000,000
Other philanthropy	<u>\$ 5,000,000</u>
Total Estimated Contribution	\$500,000,000

III. DURATION

Through March 1, 2026

IV. COUNTERPARTS

This MOU may be executed in any number of counterparts and by the parties hereto on separate counterparts, each of which when so executed and delivered shall be an original, but such counterparts together shall constitute one and the same instrument.

V. NON-BINDING AND NO LEGAL PARTNERSHIP OR JOINT VENTURE

This MOU is non-binding on any of the parties and does not create any legal or other duty or requirement. This MOU is meant to set forth a collective purpose and understanding that will assist in moving specific programs, funding, and effort to accomplish the goals and intentions provided for in this MOU. Notwithstanding the foregoing, because each party will be undertaking efforts pursuant to this MOU, there is an expectation that any party will notify the other parties if their intent materially differs from this MOU. However, any specific binding

expectation must be created through a binding agreement between any of the parties. Thus, the parties agree that they are not entering into a legal partnership, joint venture or any other business arrangement, nor is the purpose of this MOU to enter a commercial undertaking for monetary gain. Neither party will refer to or treat the arrangements under this MOU as a legal partnership or joint venture or take any action inconsistent with such intention.

Contact Information

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200 South

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Governor Josh Green, M.D.
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Kuhio Lewis
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Kapolei, Hawaii 96707

Hawai'i Community Foundation
Micah A. Kāne
President & CEO
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Honolulu, HI 96813
(808) 537-6333

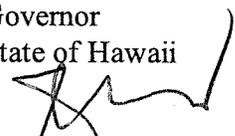
Robert Fenton
FEMA

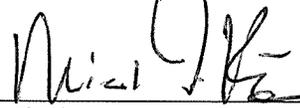
Amanda Ree
Red Cross
National Headquarters
California

SIGNATURES:

 Date:
Richard Bissen
Mayor
County of Maui

 Date:
Josh Green, M.D.
Governor
State of Hawaii

 Date: 1/5/2024
Kuhio Lewis
CEO
Council for Native Hawaiian Advancement

 Date:
Micah A. Kāne
CEO & President
Hawai'i Community Foundation

_____ Date:
Robert Fenton
FEMA

 Date: 1/5/2024
Amanda Ree
Director, Wildfire Long-Term Recovery Programs
American Red Cross

EXHIBIT A

Project	Lead Party	Support	Temporary (T), Permanent (P) or Both (B)	Other Needs
Return to residence	County		B	Funding likely needed for home preparation (new appliances), repair, and moving costs
Host Families	CNHA	HCF, ARC	T	
Direct Lease (Short Term Rental – STR)	FEMA	CNHA	T	FEMA Program
ADU/TDU	County		B	
Hotels	State	ARC	T	FEMA funded Program, administered by the State
Temporary Assistance for Needy Families	State		T	State Program, administered by DHS, rental and mortgage assistance
Rental Assistance Program (RAP)	State		T	State Program, administered by DHS, use of Airbnb units.
State Build	State	Developer	B	State Program
FEMA Build	FEMA	County	B	
Private Build	County	Developer	B	



Appendix F

State Housing Program Documentation

Version	Summary of Policy Changes	Description of Policy Changes	Effective Date
1.5	Initial Version	N/A	June 10, 2024
2	Restructured document to align with program implementation	Following the launch of the program, HI-ORR restructured the document to focus on policies and separated out procedures into programmatic documentation.	August 30, 2024
3	Addition of 1.3.1	HI-ORR updated the policy to, as needed, expedite the placement of applicants whose jobs support critical services essential to recovery.	October 7, 2024
4	Updates to Purpose, Key Terms, Sections 1.2 and 4; New sections for 2.1.3 and 3	<p>HI-ORR updated the policy to:</p> <ul style="list-style-type: none"> • Document the incorporation of the Rental Assistance Program (RAP). • Update the definition of "household" to specify that the household comprises of individuals who resided together in the same pre-disaster address. • Document that the application period closed on January 15, 2025. • Clarify that a component of HIHP eligibility requires that the applicant was not removed from another 2023 Maui wildfires interim housing program for violation of a rule or criteria that would apply to HIHP. • Incorporated the program's definition of administrative closures and how administrative closures apply to applications. • Updated the conditions that would place an application on-hold. 	January 17, 2025
5	New section for 2.1.4	HI-ORR clarified that applicants who have applied for and received housing assistance from another organization, including FEMA, but have not been able to utilize the assistance may still be eligible for HIHP.	February 1, 2025



Interim Housing Program Policy

Maui Wildfire Recovery

February 1, 2025

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Authorization

Document Owner	Hawai'i Office of Recovery and Resiliency (HI-ORR)
Department Project Manager	Luke Meyers
Approved By	Luke Meyers
Date Originated	June 10, 2024

Version Control

Version	Significant Changes	Approved	Effective Date
1.5	Initial Version	Acknowledged via email	June 10, 2024
2	Restructured document to align with program implementation	 Digitally signed by Luke Meyers Date: 2024.08.30 16:15:53 -10'00'	August 30, 2024
3	Addition of 1.3.1	Approved by David Lopez (via email)	October 7, 2024
4	Updates to Purpose, Key Terms, Sections 1.2 and 4; new sections for 2.1.3 and 3	Approved by Luke Meyers (via SharePoint)	January 17, 2025
5	New section for 2.1.4	Approved by Luke Meyers (via SharePoint)	February 1, 2025

Purpose

This document contains the formal policy guidance of the Hawai'i Interim Housing Program (HIHP or Program) policy as administered by the Hawaiian Office of Recovery and Resiliency (HI-ORR).

HIHP provides direct interim housing assistance to eligible applicants who were impacted by the 2023 Maui Wildfires (FEMA DR-4724-HI).

HIHP was launched in July 2024. The end date will be determined by the State of Hawai'i.

The policies in this document apply to the following sites:

- **Ka La'i ola**
 - *Responsible State Entity:* Department of Human Services (DHS)
 - *Responsible Property Manager:* HomeAid
- **Hale 'O Lā'ie**
 - *Responsible State Entity:* Hawai'i Housing Finance and Development Corporation (HHFDC)
 - *Responsible Property Manager:* Paramount Hotels LLC
- **Rental Assistance Program units**
 - *Responsible State Entity:* Department of Human Services (DHS)
 - *Responsible Property Manager:* Various

This document will be adjusted as needed by HI-ORR to reflect updates to the policies included. Any changes to this document must be approved by HI-ORR or an authorized representative in writing.

Key Terms

Adult	An individual who has attained the age of eighteen (18) years or an individual under the age of eighteen (18) years who provides documentation of legal emancipation.
Applicant or Primary Applicant	An individual who has applied to the Hawai'i Interim Housing Program (HIHP) for interim housing assistance
Household	All individuals who resided in the pre-disaster address who are collectively represented by the primary applicant in the application, and may reside in the HIHP unit(s) associated with that application. Additionally, if new household members (who were not part of the pre-disaster household) will reside in the HIHP-provided unit, the names must be provided to HIHP and reasons for the addition of the household member must be disclosed.
Disaster Case Management Program (DCMP)	A state-led program that provides access to specialized support and resources to guide recovery of Maui wildfire survivors through disaster recovery planning and assistance with unmet needs
Property Manager	A person or organization that manages one or more Program sites

1. Applications

The Program accepts applications through a publicly available portal to ensure that all potential applicants have access.

1.1 Application Process

HIHP applications will be accepted via the application portal. The Program provides access to a Contact Center for applicant support in completing the application.

1.2 Application Period

The application period is open until January 15, 2025. In advance of closing the application portal, the Program will provide a 30-day notice on the State's website. The Program will also issue a press release in advance of closing the application period.

1.3 Prioritization of Applications

The Program reviews complete applications in the order in which the applications are submitted. A complete application includes all information and documentation required to make an eligibility determination. The Program may consider extenuating circumstances outside of the standard prioritization process.

1.3.1 Expedited Placement for Essential Services Providers

A subgroup of HIHP applicants whose jobs support critical services essential to recovery can be established and their placement can be expedited as appropriate.

1.4 Application Limit

Applications are limited to one per household. The benefit of the Program will be determined on a household basis.

2. Applicant Eligibility

Eligibility criteria have been established to ensure that interim housing is made available under this program only to households with documented needs related to the 2023 Maui Wildfires.

2.1 Eligibility Criteria

Pre-disaster residents of Maui County who, at the point of application, document an interim housing need related to the 2023 Maui Wildfires (FEMA DR-4724-HI) are eligible for HIHP.

2.1.1 Proof of Disaster Impact

The primary applicant must provide proof of disaster impact by demonstrating that either:

1. The pre-disaster address is **not** habitable as a result of the disaster; OR,
2. The primary applicant lost access to or use of their pre-disaster housing unit due to a disaster-related inability to pay for housing.

2.1.2 Continuation of Eligibility

The household has **not** been previously removed (by a property manager) from a Program unit for a violation of rules and/or requirements that apply to all active HIHP sites.

2.1.3 Compliance with Rules Continued Eligibility Criteria of Other Temporary or Interim Housing Programs

The household has not been previously removed from other interim housing programs providing housing assistance for survivors of the 2023 Maui Wildfires. If the applicant or members of the applicant's household have been removed from other disaster housing programs for violation of rule or criteria that would apply to the HIHP housing solutions, the applicant would remain ineligible for a HIHP housing solution. Examples of other disaster housing programs include but are not limited to: Federal Emergency Management (FEMA) housing programs, other housing programs funded by the State of Hawaii and/or the County of Maui, and non-profit housing programs.

2.1.4 Non-Duplicative Housing Assistance

Applicants must not be receiving equivalent housing benefits from other programs during the application and placement period. If the applicant or any household member has applied for and received housing assistance, including, but not limited to FEMA housing assistance, **and** they are unable to effectively utilize such assistance, the applicant may still be eligible for HIHP, subject to meeting the other eligibility criteria.

For example, if the applicant has applied for and received a one-time rental assistance award without available rental options in the market or without having been offered or added to FEMA Direct Housing, the applicant may still be considered for HIHP eligibility.

3. Administrative Closures

The Program may administratively close an application when the applicant's interim housing needs are met by a source external to the Program.

3.1 Types of Administrative Closures

An application will be administratively closed in the following circumstances:

1. Applicant is eligible for and currently receiving FEMA housing assistance; OR,
2. Applicant has received insurance funds for Additional Living Expenses or Loss of Use coverage and is applying the funds towards housing for the foreseeable future; OR,
3. Applicant has identified an independent housing solution for the foreseeable future.

During the period of performance of the Program, an application that was administratively closed will be reopened if the applicant's housing assistance external to the Program ends and the applicant requests interim housing assistance at that point, provided the program is still open and the applicant completes their application.

4. On-Hold Applications

The Program will categorize an application as “on-hold” when the Program is unable to match or place the applicant at a given point in time.

4.1 Types of On-Hold Applications

An application can be placed on-hold in the following circumstances:

1. Applicant has been referred to an alternate housing solution and is awaiting confirmation from the alternate housing solution; OR,
2. The Program has not identified an adequate site match; OR,
3. The Program has not identified an adequate unit placement.

The Program will remove the applicant from on-hold status when the applicant’s circumstances change.

5. Inactive Applications

The Program categorizes an application as “inactive” when the applicant is not consistently providing sufficient information or documentation to progress the application through the Program. Applications that are inactive for more than 60 days or classified as inactive when the program application date closes may be administratively closed.

5.1 Types of Inactive Applications

An application can be categorized as inactive in the following circumstances:

1. Applicant does not complete the application in the portal within 30 calendar days of initiating the application; OR,
2. Applicant contacted the Program to withdraw the application; OR,
3. Applicant is non-responsive to outreach attempts for 30 calendar days.

During the period of performance of the Program, applicants may request to continue an inactive application by providing complete information and documentation to the Program.

6. Conditions of Continued Participation

The applicant must meet conditions to continue to receive housing assistance through the Program.

6.1 DCMP

The primary applicant must agree to allow their information to be shared with the Disaster Case Management Program (DCMP). The applicant must participate with DCMP as directed by the Program.

6.2 Background Checks

To be placed in a HIHP unit, all adult household members must pass a background check, which entails demonstrating that they have not been convicted for the distribution or manufacture of a controlled substance, crimes involving violence, sexual crimes within the last ten years, or appearing on a sex offender registry.

6.3 Compliance with Program and Property Management

The primary applicant and household members must comply with the requirements, policies, and requests of the HIHP, the requirements, policies, and requests of the Program's associated housing sites, and applicable state and/or federal laws. Non-compliance may result in removal from the Program.

6.4 Additional Requirements

The Program reserves the right to implement additional requirements for applicants during the period of performance for HIHP.

7. Payments to the Program

The primary applicant is not responsible for any payment to the State or State's vendors to complete an application, submit an application, appeal a decision, or complete a background check.

Through August 2025, the primary applicant is not required to remit payment for rent or utilities. HIHP may, at its sole discretion and with appropriate notice, ask the survivor household to remit reasonable payment for rent or utilities.

The primary applicant may be responsible for payment to the State or property manager for property management fees, such as fees related to pets. Applicants must be notified of any fees in writing prior to move-in or rental agreement renewal(s).

8. Functional & Access Needs Accommodations

The Program aims to provide reasonable accommodations to any eligible applicant who requests assistance for functional and access needs.

The Program will assess the functional and access accommodation requests to determine the preferred course of action, which may include, but is not limited to, altering an available unit or identifying another housing unit, location, or program for the household.

9. Applicant Recertifications

The Program may implement a recertification process to determine ongoing housing needs for applicants placed in Program units. As part of the recertification, the Program may require that the applicant comply with additional Program conditions to continue to receive assistance.

10. Appeals

The Program will provide an opportunity for applicants to appeal to ensure that applicant requests for assistance have been properly adjudicated and that the stated concerns of applicants are adequately represented.

10.1 Types of Appeals

The applicant may submit an appeal when any of the following actions occur:

- The applicant did not meet the eligibility criteria; OR
- The applicant has reason to believe that a household member did not pass the background check due to an error.

10.2 Deadline for Appeals

The applicant has fourteen (14) calendar days from the date of an ineligibility notice to request an appeal. The Program will inform the applicant of the deadline and method to submit an appeal in a written notice.

10.3 Determination of Appeal Decisions

The State will determine the final appeal decision.

11. Compliance

The Program will maintain compliance with the policy to ensure transparency and fairness.

11.1 Adherence to HIHP Policy

All active Program documents and processes must align with the policies outlined in the version of this document in effect.

11.2 Amendments to HIHP Policy

This document will be adjusted as needed by Hi-ORR. Any changes to this document must be approved by Hi-ORR or an authorized representative in writing.

11.3 Quality Assurance and Quality Control

The Program's Quality Assurance and Quality Control measures will uphold the policies outlined in the version of this document in effect.

12. Prevention of Fraud, Waste, and Abuse

Any employee of the Program will report suspected fraud, waste, and abuse to the Hawai'i State Ethics Commission. Additional information may be found here: <https://ethics.hawaii.gov/anti-fraud/>.



Lessons Learned

Extenuating Circumstances

Purpose

The purpose of this document is to present lessons learned from the Extenuating Circumstances process of the Hawaii Interim Housing Program (HIHP). All extenuating circumstance cases are processed by the HIHP Constituent Services Team and reviewed for escalation by the Extenuating Circumstances Review Team (comprised of senior HIHP leadership). If approved by the Extenuating Circumstances Review Team for escalation, the case is presented to a State Review Team comprised of representatives from State partner agencies for a vote.

The list below defines the types of extenuating circumstances identified by HIHP. This list is non-exhaustive and circumstances outside of this list may have also been considered for escalation.

- The applicant is unhoused or precariously housed (e.g., the applicant reports living in a tent).
- The applicant's current housing solution increases the risk to health and safety of the household (e.g., the applicant and minor children live in a car; one or more household members are at risk of domestic violence or intimate partner violence in the current housing solution).
- One or more household members have medical needs exacerbated by current housing instability (e.g., the applicant lives in car and utilizes medical device that requires access to an electrical outlet).
- One or more household members is currently employed in a role that supports critical infrastructure or lifeline services, and the current housing solution poses an impediment to fulfilling that role (e.g., the applicant is currently employed as a teacher in the Hawai'i Department of Education and requires proximity to their place of employment).
- Other circumstances and conditions as appropriate.

Lessons Learned

Policy and Program Design

Observation

The Extenuating Circumstance process for HIHP was implemented after program launch. The need for this process, and the policy to support its functionality, was identified when the team started processing applications and observed that some applicants had critically urgent needs.

Adjustment

The HIHP Team implemented an Extenuating Circumstance process in response to this observation. The HIHP team utilized the already existent Constituent Services Team to review and process extenuating circumstances cases. Procedures were updated to reflect the utilization of this process and ensure proper documentation.

Recommendation

Using the process utilized by HIHP as a guide, future programs may consider establishing a screening for extenuating circumstances prior to program launch. This will ensure that applicant communication is streamlined, potential escalations are identified early in the review process, and potential risks of noncompliance with program policy are properly mitigated.

Roles and Responsibilities

Observation

The HIHP Extenuating Circumstance process requires the utilization of multiple teams and team members. The process itself is performed largely by the Constituent Services Team. However, the applicants the Constituent Services Team are working with have been previously contacted by other Criteria Review Team members as part of the standard eligibility review. The team identified potential challenges of duplicating efforts across teams and confusing applicants with multiple contact points.

Adjustment

The Constituent Services Team has been able to mitigate the risk of duplicative work or duplicative outreach effort by working closely with Criteria Review Team members who have already worked on the case. The Constituent Services and Criteria Review Teams work together to assess which team will conduct outreach.

Recommendation

As mentioned in the previous recommendation, designing and documenting the Extenuating Circumstance process before launch will help to mitigate potential risk of duplicative outreach attempts.

Future programs may benefit from assigning a single team member for each case. By utilizing a singular team member per case, the team member can build a working relationship with the applicant.

Reporting

Observation

The collection of information and documentation and the associated reporting related to Extenuating Circumstances were not standardized before the need for the process was identified.

Adjustment

The Constituent Services Team designed and implemented a standardized form for collecting information from applicants as cases were identified.

Recommendation

A standardized form for data collection should be implemented at program launch. This will ensure no information is lost, data collection efforts are not duplicative, and all cases are processed as consistently as possible.

The form created and implemented by the HIHP Constituent Services Team enabled the consistent collection of data and documentation of all relevant cases and allowed for the streamlined presentation of cases for review.

Review and Voting for Cases

Observation

The Extenuating Circumstances State Review Team meets once per week to review cases. Occasionally, cases requiring immediate escalation were identified and required review outside of the established weekly review period. Due to scheduling constraints, the State Review Team was not able to consistently meet more than once per week.

Adjustment

The Constituent Services Team utilized alternative methods of review and approval with the team for cases that required processing outside of the previously established timeline. For example, as needed, the Constituent Services Team sent expedited cases for review via email. The State Review Team was able to review cases through this method.

Recommendation

For future programs, if additional meetings are not possible, an alternative method for voting/decisioning should be implemented (e.g., voting via email). This will allow for the program to be responsive as needed to best meet applicant needs.

Defining Terms

Observation

The Constituent Services Team observed various interpretations and applicability of terms, such as “pre-disaster homelessness” and “housing insecurity.” Although an applicant may not self-identify as “housing insecure,” the applicant may present circumstances that meet that definition.

Adjustment

The Constituent Services Team trained the various teams on the programmatic interpretation of relevant terms. The Constituent Services Team also trained staff on interpreting these definitions in a variety of cases.

Recommendation

Specific terms and eligible cases should be clearly defined before process implementation. These definitions must be reviewed and approved by all relevant parties, and be included in all related job aids, SOPs, and other guiding documents.



Appendix G

Residential Dwelling Unit (RDU) Program



Residential Dwelling Unit (RDU)

Inactive Program

Residential Dwelling Unit (RDU) Program

Various HIHP documents were created between late 2024 and early 2025 in anticipation of the launch of the Residential Dwelling Unit (RDU) program. The RDU program is inactive as of the creation of this Housing Strategy appendix. These documents are included for reference only; the HIHP is not currently implementing the materials included in this appendix. This section will be updated if the RDU program is launched at a future date.

RDU Documentation

Document	Status	Description
Email to Partners About RDUs	Approved	HI-ORR prepared an email to be sent to all relevant partners in advance of the launch of the RDU program. The email was not sent as the launch did not proceed. The approved draft included topics such as the exploratory nature of the program, the call campaign and script, frequently asked questions, a tentative timeline, unresolved items for further discussion, and next steps.
Executive Report	Approved	HI-ORR created an executive report for the RDU program. This report is included in this appendix for reference only.
RDU Script and FAQs (V0)	Approved	HI-ORR created a call script and frequently asked question (FAQ) list in advance of the launch of the RDU program. The script was approved but not finalized as the launch did not proceed. The approved draft included a program interest call script and list of FAQs and their answers.
Email – RDU Not Feasible on Site	Not Approved (Draft)	HI-ORR prepared an email to be sent to applicants whose sites were inspected and determined not feasible for RDU placement. The email did not move forward for approval because the RDU program is inactive. The draft included information on the site assessment, its results, additional interim housing pathways, and contact information.
RDU Script and FAQs (V1)	Not Approved (Draft)	HI-ORR created an updated frequently asked question (FAQ) list in advance of the launch of the RDU program. The FAQs did not move forward for approval because the launch did not proceed. The draft included a list of FAQs about the RDU and their answers.



EXECUTIVE CHAMBERS
KE KE'ENA O KE KIA'ĀINA

The Residential Dwelling Unit Program An Alternate Housing Solution

Executive Summary

The Residential Dwelling Unit (RDU) Program ("the Program or RDU Program") was organized to address immediate and mid-term housing needs for survivors of the August 8, 2023, Lāhainā, Maui wildfires. Program implementation began in November 2024 and was coordinated by the Hawai'i Office of Recovery and Resiliency (HI-ORR) which aimed to look within the Hawai'i Interim Housing Program (HIHP) that it was managing for potential eligible applicants. The goal was to provide displaced Lāhainā private property owners with a State funded safe and sustainable housing solution on their property to temporarily live in, thereby opening up limited emergency housing solutions to renters, which makes up 80% of the HIHP applicants.

To realize the RDU Program, HI-ORR expanded HIHP and the role of Tidal Basin to gain additional operational support. An interest campaign was launched, and 138 out of 185 property owners in (and out of) HIHP were interested in learning more about having an RDU on their property. Funding for the Program in the amount of \$15 million was to come from the Major Disaster Fund (MDF). Weekly meetings with officials from Maui County, State Departments, and Federal partners aided in understanding County permitting, current Maui County infrastructure rebuild schedules, legal issues, site assessment requirements, and equipment needs; thereby moving the Program forward.

The RDU Program was paused on February 10, 2025, due to federal funding concerns and officially transferred from the Hawai'i Office of Recovery and Resiliency to the Department of Human Services on February 27, 2025, for further direction and execution, if any.

This report provides the RDU Program's background, objectives, projected costs, timeline, challenges and possible solutions, and entities engaged in the RDU Program.

Background

In October 2024, the topic of accessory dwelling units on private properties surfaced in a conversation between State of Hawai'i Governor Josh Green, County of Maui Mayor Richard Bissen, Department of Human Services (DHS) Deputy Director Joe Campos, and HI-ORR Branch Chief Luke Meyers. The original thought was to put homeowners back onto their properties while they were rebuilding their private homes thereby opening interim housing to renters. A secondary benefit would be presence back in the neighborhoods. Theft was becoming a concern as construction materials stored on property were being stolen.

In November 2024, Governor Josh Green tasked HI-ORR to investigate the feasibility of placing 55 various models and sizes of accessory dwelling units onto private property and pronounced a budget of \$15 million to come from the Maui wildfire MDF managed by the Hawai'i Emergency Management Agency (HI-EMA). The Governor requested that the project be completed in six months or May 31, 2025, using units pre-purchased by DHS's KLO subcontractor Home Aid Hawai'i (HAH). The 55 units would come from KLO's intended Phase II – Pods 26, 27, and 28. Installation of these three pods was scheduled for cancellation. At this time of assignment to HI-ORR, the units were already on their way to Hawai'i.

HIHP data showed the population at around 250 out of more than 2000 applicants as potential property owners. The balance of HIHP applicants were renters. HI-ORR also considered current Federal Emergency Management Agency (FEMA) efforts with its Alternative Temporary Transportable Housing Unit (ATTHU) program and the count being 7 for viable private property sites following their site assessments. Therefore, a mindful approach was necessary in the beginning phase of the RDU program development.

Program Objectives

1. Provide RDUs for 55 private property owners affected by the Lahaina wildfires.
2. Install as many as possible by May 1, 2025.
3. Ensure all participants in the RDU Program are HIHP eligible.
4. Conduct the program as fairly, equitably, and responsibly as possible given the constraints.
5. Develop RDU Program Policy, Standard Operation Procedures, and other Legal documentation.
6. Decision Point: Temporary vs. Permanent Pathway.
7. Decision Point: Operations and Maintenance, or not.
8. Decision Point: Status of Program Termination including encumbering future administration funds.

Inventory

Total of 55 units: 37 Staus units (24 1-bedrooms, and 13 2-bedrooms), and 18 Nanonests (18 2-bedrooms).

At the start of the program there were 54 RDUs. HAH and DHS confirmed that one more unit was added to the initial 54 making the total RDU count 55. Although HI-ORR obtained architect drawings of the RDUs, it did not obtain the costs per unit.

Constraints and Considerations

1. Time

HI-ORR was given six months to put 54 property owners back onto private properties. Finding 55 willing participants whose properties were ready for an RDU installation seemed initially challenging based on FEMA's ATTHU program's track record and their program included acquiring publicly owned or leased properties in addition to private property to place their ATTHUs, thereby increasing their resource pool.

Another major time constraint involved utility connections. The County of Maui requires utility connections for clean water; sewer, cesspool, or septic systems; and electrical hook-up for temporary accessory dwelling permitting. Thus, the infrastructure needed to be completed in the areas where these properties were located. Utility assessments, repair, replacements, and installations were taking place in different areas of Lahaina and all had different schedules of completion.

2. Authorities

The RDU Program was formed by the authority of the Governor's Maui wildfire related emergency proclamations and related FEMA MDF funding policies. For HI-ORR, a primary consideration for this State funded program was to ensure clarity where it came to the public perception of spending \$15 million to benefit 108 total households (54 homeowner households followed by 54 renter households). The RDU Program pulls 'fast' and 'good' from project management's "fast, good, and cheap triangle," and the State still has a responsibility to use funds wisely, protect itself from violations of inequity in service and product distribution, and not create a worse financial situation in the future for a member of the public, no matter how unintended.

Through the RDU Program, the State would essentially be giving a very select group of people a small temporary home valued at approximately \$250,000 to be placed on their private property. This opened questions to include, but was not limited to:

- Who is responsible for the operations and maintenance of the unit and its contents? For how long?
- When is the State legally liable when challenged as related to the unit and program? What types of potential challenges can the State mitigate?
- What does the State communicate to the public about this program?
- What will happen in three years when the County of Maui temporary permitting policies require an "after-the-fact" permit to extend a temporary dwelling unit permit for two more years? Who will do that?
- Who is responsible for and how does the RDU get removed in three to five years?

- What are the costs and specifications of the RDU's that will be used in this Program?
- How to address the situation if others who have received types of benefits want an RDU to return to their property? Would this be a double benefit and a violation of our own policies? Why or why not?

3. Funding

The budget to implement the RDU Program is an estimated \$15M or ≈\$250K per unit from MDF, not including the RDU's. Initial pricing is based on FEMA and Maui County standards as implemented at Kilohana; potential cost reductions may arise through modified standards. Funding for this program came from the following sources:

- Units – Pre-purchased by Home Aid Hawai'i (HAH) from DHS funds. HI-ORR did not obtain the costs of the units.
- RDU Program - \$15 million from FEMA MDF funds managed by HI-EMA for site assessment and installation.
- Initial feasibility research – Funding from HIHP monies.

Another more complex funding question is how the State's RDU Program would help people return to self-reliance. Drawing from FEMA's interim disaster housing policies relating to the 18 months of support for people to benefit from FEMA's program, HI-ORR understood that people must transition from temporary disaster housing into a permanent solution. Therefore, what is the State's responsibility to transition participants out from the State program dependency?

4. Workforce

HI-ORR enlisted the experience of Tidal Basin Group, the emergency and disaster management organization running HIHP to assist with a feasibility study and preparation of the RDU Program. Tidal Basin assisted in coordination of the RDU Program. The following partner agencies were involved in one or more discussions in the planning:

- Office of the Governor
- Maui County Office of the Mayor
- Maui County Planning Department
- Maui County Water Supply Board
- State of Hawai'i, Department of Health, Wastewater Branch

- State of Hawai'i, Department of Human Services
- State of Hawai'i Department of Land and Natural Resources, State Historic Preservation Division
- State of Hawai'i, Department of the Attorney General
- Hawaiian Electric
- Home Aid Hawaii

5. Terrain

Challenges for this program include the fact that private lots require individual site assessments, utility access, and owner consent. As utilities are still being tracked for public space installation, not all areas have utilities ready for install onto private lots, and some have cesspools that may not be certified. Approximately 25% of interested RDU applicants are in Wahikuli where properties are connected to cesspools instead of a sewer line. Before any RDU placement, cesspools must pass certification to ensure the land is suitable for any structure.

Other issues include lot location where it would be difficult for a crane to access to install a State sponsored RDU, and environmental and zoning considerations. Adherence to floodplain, fire safety, and land-use regulations even under a temporary building permit is important. Economy of scale – to maximize the cost of a crane in any given area, multiple RDU installations in the same area on the same day would be best.

Maui County Code Compliance: RDUs are permitted for up to five years. By the end of the fifth year, property owners must either complete the process of making the RDU permanent or remove the unit from the property.

At the time of program development, the RDUs in their varying types and sizes were on their way to Hawai'i by ship. They would arrive in Honolulu, then be transported to Maui. The RDUs would be stored at a designated location at Ka La'i Ola. Home Aid Hawai'i shared a shipping and delivery schedule. HI-ORR notes that the RDU phased arrival schedule exceeded the six-month requested completion time (May 1, 2025) originally requested by the Governor. However, HI-ORR was confident that at minimum commencement of placements could take place with the units that arrived earlier granted sites were confirmed ready for unit placement.

Finally, relating to terrain constraints, even if the installations were temporary, the timing and feasibility of the removal of the RDU was still in question. First, there is no funding built into the current budget for removal. Second, Tidal Basin noted that it has been their experience that if the State is removing a State funded dwelling unit, doing so required permission to access property and historically government attempts to remove a dwelling unit regardless of its temporary status has been met with great resistance (and sometimes heavy aggression) by property owners.

Timeline for Implementation

1. Community Outreach and Survey (Weeks 1–5)
 - Launch public awareness campaign and distribute surveys.
 - Analyze responses and identify eligible participants.
2. Property Assessment and Eligibility Verification (Weeks 6–10)
 - Assess properties (private and public) and notify eligible participants.
3. Permitting and Preparation (Weeks 11–14)
 - Process permits, prepare sites, and schedule placements.
4. RDU Placement and Occupancy (Weeks 15–20)
 - Install RDUs on private lots and public properties and facilitate move-ins.
5. Transition, Support, and Termination (Months 6–60)
 - Potential to provide some support during period and build out RDU Program termination.

Decisions and Actions

1. Engagement

HI-ORR held weekly meetings and included the County of Maui in discussions about zoning and permitting. In December 2024, Tidal Basin launched a call campaign to gauge initial HIHP homeowner interest about having an RDU on their property. 111 out of 185 property owners in HIHP were interested. An additional 27 interested property owner names came from a member of the Mayor's Advisory Team who knew about the program and initiated external inquiries with his friends on whether they needed an RDU. All of these people were cross-checked to the HIHP database to determine eligibility for HIHP.

2. RDU Program Eligibility

It was decided a property owner would need to 1) be enrolled in HIHP, and 2) be enrolled in the Disaster Case Management Program (DCMP). This meant that to receive an RDU the participant would be a wildfire survivor that did not receive any insurance, nor any other State or federal funding assistance, a requirement for eligibility in HIHP. The requirement to be enrolled in DCMP provides the participant with additional governmental and non-governmental organization (NGO) resources to support their journey of returning to independence.

3. Agreement of Property Owner to Assume Responsibility

HI-ORR decided that the RDU Agreement between the State and the property owner would be written so that the property owner assumes ownership and responsibility of the RDU. The State would only cover installing the unit. It would be emphasized and must be understood by the property owner that they would take responsibility of the RDU including applying for after-the-fact permits, its upkeep, removal, and future consequences, if any, for non-compliance of removal. On behalf of the State, HI-ORR believed it inappropriate to encumber a future administration for a major termination of a program if it was foreseen, and no funding was built into its current state.

4. Life of RDU Program

To maximize the RDU Program without violating any Maui County permitting rules in the immediate timeframe, the program should run concurrently with HIHP, follow HIHP policies, and end in five years from the start of the fire concluding August 2028. Interim disaster housing provides short-term places for people with nowhere else to live to stay temporarily so they can meet basic needs such as food, safety, and hygiene, and be supported to as they journey to return to permanent housing and self-reliance. HI-ORR intended to work with Maui County and provide them with a list of properties that hosted the RDUs provided by the State.

Conclusion

The RDU Program is a viable short- to mid-term housing solution for Lahaina wildfire survivors. To ensure successful implementation, the program must focus on streamlined permitting, cost efficiency, infrastructure investments, and comprehensive transition planning. The program must also align with Maui County regulations, ensuring that RDUs are either transitioned into permanent housing by the end of the fifth year or removed accordingly.

Supporting Documents

The following documents were started for the RDU Program. The Right of Entry form is the only document reviewed and approved by the State Attorney General's Office. All other documents are in draft form and remain unapproved by the Hawai'i Office of Recovery and Resiliency and unreviewed by the State Attorney General.

Attachment 1 – RDU Right-of-Entry Authorization

Attachment 2 – DRAFT RDU License and Occupancy Agreement

Attachment 3 – DRAFT RDU Standard Operating Procedures

Attachment 4 – DRAFT RDU Policy

Attachment 5 – DRAFT RDU Press Release

Attachment 6 – DRAFT RDU Informational Flyer



Hawai'i Interim Housing Program

Right-of-Entry Authorization

The undersigned hereby certifies and warrants that he/she/they is/are the owner(s) of record or the authorized agent of said owners of the property described herein. The undersigned hereby authorizes the State of Hawai'i, through its Office of Recovery and Resiliency (HI-ORR), under the Hawai'i Interim Housing Program (HIHP), its agencies, contractors, and sub-contractors, the authority and permission to enter upon the land and enter into the premises located at the physical address of:

for the purposes of performing an assessment of the property's lot, to determine the feasibility to install a *Residential Dwelling Unit* ("RDU") within the premises of undersigned's property.

This assessment will be performed as part of services related to the disaster recovery program identified above and is limited to determine preliminary feasibility of the RDU installation. The undersigned's participation in the program and lot assessment is voluntary and signing this Right-of-Entry does not prohibit the owner from withdrawing from participation at any time during the process. The completion of this document does not guarantee that the program will provide the owner with any type of assistance, but completion and submission of this form is necessary to determine if assistance by the installation of an RDU is feasible.

The undersigned agrees and warrants for themselves and the owner(s) of the property, to defend, indemnify, and hold harmless the State of Hawai'i, its Office of Recovery and Resiliency (HI-ORR), their agencies, employees, officers, contractors, and sub-contractors, for damage of any type, whatsoever, either to the above described property or persons situated thereon and hereby release, discharge, and waive any action, either legal or equitable that might arise out of any activities on the above described property in association with the performance of the assessment or entry onto the property.

This Right-of-Entry permission will be good for a period of time of days following the

execution of this document.

For the considerations and purposes set forth herein, I/we sign this Right-of-Entry this day of , 2025.

Owner Signature:

Name of Owner:

Telephone Number:

Co-owner Signature:

Name of Co-owner:

Telephone Number:

**STATE OF HAWAII, OFFICE OF RECOVERY AND RESILIENCY
Hawai'i Interim Housing Program
Residential Dwelling Unit (RDU) Program**

LICENSE AND OCCUPANCY AGREEMENT

HIHP Application No.:	Applicant Name ("Licensee"):	SSN Last 4 Digits: XXX-XX-_____	
FEMA Application Number:	Disaster No.: DR-4724 Date of Declaration: 8/10/2023	Location (County): Maui, Hawai'i	
Applicant's Primary Residence Address:			
Applicant Phone Number:	Alternate Phone Number:	Email:	
Household Members ("Authorized Users")			
Name	Relationship to Applicant	Age	Sex

I. Personal Information

Personal information required on this form is collected for the primary purpose of administrating assistance to disaster recovery applicants under presidential declared disaster FEMA-DR-4724. This information may be reviewed by the State of Hawaii, Office of Recovery and Resiliency ("HI-ORR") and/or its duly authorized contractor for quality assurance purposes to assess service provided to disaster assistance applicants. HI-ORR collects social security numbers (SSNs) to verify identities to prevent duplication of benefits.

The disclosure of personal information on this form is voluntary, however, failure to provide all information requested may delay or prevent individuals from receiving disaster assistance.

II. Residential Dwelling Unit (RDU) Program

The State of Hawai'i's Office of Recovery and Resiliency ("HI-ORR"), through its Residential Dwelling Unit (RDU) Program, and its agents, employees, contractors and subcontractors (collectively "the State") may provide the applicant with a prefabricated dwelling unit to be installed on the lot of land owned by applicant where applicant's home was located pre-disaster (shown above as "*Applicant's Primary Residence Address*", and hereafter referred to as the "Premises", provided that certain conditions stated herein are met and that the applicant agrees to the terms and conditions contained in this License and Occupancy Agreement (the "Agreement").

Only applicants eligible for the Hawai'i Interim Housing Program ("HIHP"), who have been found to have a current interim housing-related need, may receive assistance under the RDU Program.

The placement of the RDU on the Premises by the State will be temporary. However, upon request by applicant, the RDU Program may offer the applicant the option to permanently place the RDU on the Premises. The RDU

Program may install an RDU on the Premises prior to construction of the permanent dwelling on the Premises, or the applicant may elect to reside in the RDU without attempting to construct another dwelling on the Premises. The RDU will be installed once, and it will not be removed to place it on a different location within the Premises. Therefore, the applicant should provide any relevant information on future use, especially erection of other permanent structures prior to RDU placement.

If the applicant chooses a permanent placement of the RDU, the applicant will be responsible for to apply and obtain the necessary building permits and occupancy certificates, as well as for payment of any costs or fees associated with obtaining said permits and occupancy certificates.

The permanent placement of the RDU may not be available due to factors outside of the State's control, such as, but not limited to, site conditions and applicable state and local laws and regulations.

III. Use of the RDU. Additional Terms and Conditions.

1. Ownership of the Premises: The applicant must be the owner of the Premises and the home damaged or lost due to the declared disaster. If the Premises are commonly owned by the applicant and a third party, the applicant must provide written documentation that the other owner(s) consent to the RDU placement. The applicant is solely responsible for obtaining such consent, and the State shall be entitled to reasonably rely on said consent as a material representation by the applicant to secure the consent under the RDU Program.
2. Primary Residence: The applicant must maintain the RDU as the primary residence for the applicant and the applicant's household for the duration of the RDU Program, the applicant's participation in the RDU Program, or applicant's failure to comply with the terms and conditions included herein, whichever occurs first.
3. Use by Third Parties or Leases, Prohibited: The use of the RDU is limited to serving as primary residence of the applicant and applicant's household, as identified in this Agreement. At no time through the duration of this Agreement, will the applicant allow people not identified as authorized users to occupy the RDU. **Leasing or sub-licensing the use of the RDU is also prohibited during the duration of the RDU Program.**
4. No Payments by Applicant: The applicant is not responsible for any payment to the State or State's vendors for the installation or use of the RDU during the duration of the RDU Program.
5. Utilities, Maintenance and repairs of RDU: The applicant will be solely responsible for the cost of utilities, including connection fees, and for all costs related to maintenance and repairs to the RDU.
6. Placement of the Temporary RDU: The RDU will be placed on the Premises owned by the applicant as allowed by state and local laws and regulations under temporary permit requirements.
7. Placement of a Permanent RDU: Upon request by the applicant, the RDU Program may offer the applicant the permanent placement of the RDU, provided that permanent placement is possible. The applicant acknowledges and accepts that permanent placement of RDU may not be possible, due to factors outside of the State's control, such as, but not limited to, site conditions and applicable state and local laws and regulations. The applicant will be responsible for to apply and obtain the necessary building permits and occupancy certificates, as well as for payment of any costs or fees associated with obtaining said permits and occupancy certificates.

IV. Ownership of the RDU

1. The State, as Licensor, owns the RDU provided to applicant and retains the right to control use of its property at all times, unless ownership is transferred by the State to the applicant.
2. The State, may enter, occupy, and take possession of the RDU at any time. The State shall endeavor to provide applicant and authorized users notice of at least twenty-four (24) hours prior to entry or inspection of the RDU, however, notice may not be possible in an emergency. The State reserves the right to take immediate possession of the RDU when the State determines that repossession is warranted.

V. Applicant Duties and Responsibilities

1. Duty to Cooperate with State Representatives: At all times, the applicant and other authorized users shall fully cooperate with the State, its employees, agents, contractors and subcontractors, who at time may need information from the applicant in order to install the RDU, and/or verify applicant's continuous eligibility for assistance.
2. Duty to Comply with Enforcement or Removal Action: The applicant and authorized users will comply with any notice of revocation received from the State. The applicant is responsible to ensure that applicant and any authorized users vacate the RDU by moving out and surrendering possession of the RDU no

later than the date set forth in a written notice of revocation, or upon oral notice to vacate immediately, for good cause as determined by the State. Applicant is solely responsible for the household's personal property, which is placed in the RDU, and for removing all personal property from the RDU upon receiving notice of revocation. Under no circumstances shall the State, its employees, agents, subcontractors and contractors be responsible to applicant or any third party for the damage or loss of any personal property in the RDU at the time the State or its duly authorized contractor removes the RDU. Applicant agrees to hold harmless the State of Hawai'i and any of its agencies, agents, contractors, subcontractors, and assigns for damage of any type whatsoever either to property or persons resulting from such enforcement actions.

3. **Duty to Pay Costs and Fees:** The applicant may be responsible for a portion of the installation costs that exceed the State's contribution towards the costs of installation. The applicant will be informed of these costs prior to scheduling the installation of the unit. The applicant will submit payment to the State or an assigned vendor of the State, prior to scheduling the installation of the unit. If applicable, the applicant may be responsible for the cost of building permits if the applicant receives a permanent RDU. The applicant shall have a duty to reimburse the State for costs associated with use of the RDU beyond that specifically authorized by this Agreement including, but not limited to:
 - Where the duration of use of the RDU is expired and has not been renewed or otherwise extended with a new or revised agreement.
 - Applicant obtained assistance under the RDU Program through misrepresentation or fraud.
 - Applicant or authorized users failed to comply with any term of this Agreement.
 - Applicant or authorized users caused, or allowed to be caused, damage to the RDU beyond normal wear and tear.
 - This Agreement is revoked.
4. **Other Duties:** Applicant/Licensee shall have a duty to:
 - a) Ensure the RDU is used for dwelling purposes only.
 - b) Pay all required utility charges, including deposits, for the RDU.
 - c) Keep the RDU, any furnishings, and the surrounding area in a clean and orderly condition, ordinary wear and tear is expected and assure that items or debris of any kind which may cause a possible fire hazard or other identified safety hazard are not placed near the RDU.
 - d) Refrain from making any renovations, additions, structural alterations, or changes to the RDU and any furnishings provided as part of the RDU Program;
 - e) Limit occupancy of the RDU to those persons named in this Agreement. The Applicant must notify the State in writing within seven (7) days if there is a change in occupancy and seek to gain approval for changes to authorized users in writing through a new agreement;
 - f) Evacuate from the RDU if mandatory or voluntary emergency evacuation orders are issued by State or local authorities and those orders cover the area occupied by the RDU.
5. **Duty to Maintain and Repair the RDU:** The applicant understands and agrees that the applicant is solely responsible for maintaining the RDU in good condition and working order.
 - a) The State will only be responsible for performing repairs to the RDU for warranty items, manufacturer's defects or improper installation of the RDU. The applicant is responsible to promptly notify the State when any warranty item, manufacturer's defects or improper installation of the RDU is found in the RDU. The State will have the sole discretion to determine whether the repair requested by the applicant qualifies as a warranty item, manufacturer defect or improper installation.
 - b) The applicant will be responsible for all maintenance and repairs of the RDU including, but not limited to: replacement or repair of plumbing fixtures such as faucets and sinks, toilets, showerheads, and bathtubs; replacement or repair of window and door closure systems, hinges, anchors, locks; external and internal paint; ordinary cleaning of windows (both inside and outside).
 - c) The applicant will not perform alterations or modifications to the structure of the RDU or to its internal layout.
 - d) Failure to maintain the RDU in good working condition, perform required maintenance and repairs, or damaging or allowing others to damage the RDU, will be considered a material violation of this Agreement, at which point, the applicant may be considered as non-compliant.

VI. Right of Entry

As a condition of receiving assistance from the RDU Program, the undersigned applicant and all named users hereby authorize the State, its agencies, employees, contractors, to enter the Premises for the purposes of conducting inspections, assessments and site visits related to site preparation, placement of the RDU, and removal of the RDU at the end of the program, upon the Applicant's request or upon revocation of this Agreement. This Right-of-Entry permission will expire upon expiration of this Agreement, unless revoked by the applicant earlier, in which case this Agreement will be terminated.

VII. Revocation

1. The applicant agrees to comply with all the terms and conditions set forth in this Agreement. If at any time, the applicant is found to be non-complaint, the applicant will forfeit the assistance provided by the State causing the revocation of this Agreement.
2. The State, as Licensor, reserves the right to revoke this Agreement at any time if it determines that applicant is ineligible for benefits, applicant or an authorized user violated the terms and conditions of this Agreement, or for other good cause. Upon revocation, the applicant and all authorized users shall promptly vacate the RDU and allow access to the State to remove the RDU. The applicant hereby agrees to allow access to the State to remove the RDU upon determination and notice of non-compliance by the State.
3. The State may provide applicant and authorized users prior written notice of revocation of this Agreement and authorize the continued use of the RDU, up to fifteen (15) days, prior to a designated date of surrender. The State reserves the right to revoke this Agreement without notice to applicant or authorized users if the State determines that a health or safety hazard may be present. Applicant and/or authorized users failing to comply with any and all notices of revocation shall be liable to the State for costs associated with unpermitted use of the RDU and legal costs and fees required to enforce revocation.

VIII. Representations, Acknowledgements and Waiver

1. I hereby certify and acknowledge that my participation in the RDU Program is voluntarily, and that I am of legal age and sound mind, and have knowingly and willingly agreed to the terms and conditions contained herein.
2. I hereby acknowledge that the State owns the RDU provided to me under the RDU Program and is granting me, as Licensee, and authorized users within my household named herein, a revocable license to use the RDU as a dwelling. The license to use and occupy the RDU constitutes disaster recovery assistance for interim housing under the President-declared Disaster FEMA-DR-4724, Maui Wildfire.
3. I knowingly and unequivocally agree to comply with the terms and conditions of this Agreement, and any and all restrictions contained herein in consideration for the opportunity to use the RDU.
4. I am not able to live in my household's pre-disaster primary residence or obtain adequate alternate housing through no fault of my own, and the State has determined my household to be eligible for interim housing.
5. I understand that this instrument is not a lease and as such, does not convey a property or privacy interest in the RDU. I further understand that this Agreement is not assignable or transferable by me or any authorized user of the RDU.
6. If not revoked earlier, this Agreement shall expire, at the conclusion of construction of applicant's home or the duration of any applicable permitting or zoning restrictions, whichever is more restrictive.
7. I release, discharge, and waive any right or claim against the State of Hawai'i and any of its agencies, agents, contractors, subcontractors, and assigns for any action, in legal or equity that might arise out of any activities on the premises of the RDU or surrounding area.
8. By signing this Agreement, I represent, warrant and certify that every party having an interest in the Premises, if any, have authorized the placement of the RDU.

IX. Duty to Indemnify, Defend and Hold Harmless

The undersigned applicant, in his or her personal capacity, and on behalf of the authorized users, and their heirs, agents, administrators and/or assignees, agrees and warrants to indemnify, defend and hold harmless the State, its agencies, contractors, and sub-contractors, including their successors and assigns, for any and all liability, loss, damage, or destruction of any type whatsoever to the Premises, personal property and fixtures thereof, or for bodily injury or death to persons on the Premises, related to or by reason of , directly or indirectly, any action taken to

accomplish the RDU Program purposes, including without limitation, applicant's participation in the RDU Program, the State installation of the RDU, the applicant, authorized users and their invitees' use of the Premises or RDU, the applicant's failure to obtain consent from third parties with an interest in the Premises, or applicant's failure to comply with the terms and conditions of this Agreement.

The undersigned applicant, in his or her personal capacity, and on behalf of the authorized users, and their heirs, agents, administrators and/or assignees, hereby forever releases, discharges, and waives any and all liability, claims, demands, damages, injuries, losses, penalties, fines, costs, causes of action, judgments, expenses, as well as any and all actions, either legal or equitable, which the undersigned has, or that might arise, of any nature whatsoever and by whomever made, or may have, related to or by reason of , directly or indirectly, any action taken to accomplish the RDU Program purposes, including without limitation, applicant's participation in the RDU Program, the State installation of the RDU, the applicant, authorized users and their invitees' use of the Premises or RDU, the applicant's failure to obtain consent from third parties with an interest in the Premises, or applicant's failure to comply with the terms and conditions of this Agreement.

The undersigned applicant, in his or her personal capacity, and on behalf of the authorized users, and their heirs, agents, administrators and/or assignees, releases the State of Hawaii, its agencies, contractors, and sub-contractors, including their successors and assigns, from any claim, demand, cost and/or expense, including reasonable attorneys' fees incurred in defending claims and/or demands for injuries and/or damages caused to the applicant, and/or any person residing or visiting the premises where the RDU is located, as a consequence of and/or in connection that might arise out of any activities relating to the assistance provided to applicant and applicant's household, under the RDU Program and this Agreement.

X. Acceptance

By signing this Agreement, I, the applicant/licensee, acknowledge that I have read the License and Occupancy Agreement and agree to comply with the requirements stated herein. I am signing this form on behalf of all members of my household listed above as authorized users and agree to be held responsible for their conformance with the terms and conditions herein.

Applicant Signature: _____

Witness signature: _____

Applicant Name: _____

Witness Name: _____

Date: _____

Date: _____



Residential Dwelling Unit Standard Operating Procedure

Maui Wildfire Recovery

January 29, 2025

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1. Notice

This Standard Operating Procedure (SOP) was prepared by Tidal Basin Government Consulting, LLC (Tidal Basin) for the Residential Dwelling Unit (RDU) Initiative, as administered by the Hawai'i Office of Recovery and Resiliency (HI-ORR). No portion of this document may be distributed, reproduced, transmitted, or otherwise disclosed in any form to any third party without prior written approval by Tidal Basin.

This document will be updated as needed by Tidal Basin to reflect updates to policies, priorities, and programs.

2. Purpose

Document Owner	
Department Project Manager	
Approved By	
Date Originated	January 29, 2025

3. Version Change Control

Version	Significant Changes	Effective Date	Approved
V0	Initial version		
V1			
V2			

4. Introduction

On August 8, 2023, Acting Governor Sylvia Luke declared a state of emergency in the counties of Maui and Hawai'i and issued the Proclamation Relating to Wildfires.¹ At that point, several large wildfires were identified in the counties, including in the North Kohala, South Kohala, Kula, and Lahaina areas.

Then, on August 10, 2023, President Joseph Biden declared a major disaster in Hawai'i, DR-4724-HI.² This declaration provided federal funding to affected individuals in Maui County, including grants for housing, home repairs, low-cost loans, and recovery programs.³ On September 22, the president's disaster declaration was amended to include costs for debris removal and emergency measures.⁴

In July 2024, as part of the ongoing recovery effort, the State of Hawai'i launched HIHP to connect individuals and households impacted by the Maui wildfires with interim housing solutions. HIHP provides direct interim housing assistance to eligible applicants who were impacted by the 2023 Maui Wildfires (FEMA DR-4724-HI).

The RDU Initiative was launched in December 2024. The RDU Initiative operates within HIHP. The RDU Initiative provides prefabricated dwelling units to eligible HIHP applicants to enable those applicants to return to their pre-disaster properties. The end date will be determined by the State of Hawai'i (State).

¹ <https://dod.hawaii.gov/hiema/governor-issues-emergency-proclamation-relating-to-wildfires/>

² <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/08/10/president-joseph-r-biden-jr-approves-hawaii-disaster-declaration-3/>

³ <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/08/10/president-joseph-r-biden-jr-approves-hawaii-disaster-declaration-3/>

⁴ <https://www.fema.gov/disaster-federal-register-notice/dr-4724-hi-maui-update-002>

5. Acronyms

AFN	Access and Functional Needs
CRT	Criteria Review Team
DCM	Disaster Case Manager
DCMP	Disaster Case Management Program
IHED	Interim Housing Eligibility Database
HIHP	State of Hawai'i Interim Housing Program

DRAFT

6. Definitions

Adult

An individual who has attained the age of eighteen (18) years or an individual under the age of eighteen (18) years who provides documentation of a legal emancipation.

Applicant or Primary Applicant

An individual who has applied to HIHP for interim housing assistance.

Criteria Review Team (CRT)

The team that reviews applicant eligibility for HIHP.

Denial

A status that restricts or denies program participation.

Disaster Case Management

Disaster Case Management is a time-limited collaboration between a trained case manager and a disaster survivor involving the development of a disaster recovery plan and a mutual effort to meet those disaster-caused unmet needs.

Disaster Case Management Program (DCMP)

A state-led program that provides access to specialized support and resources to guide recovery of Maui wildfire survivors through disaster recovery planning and assistance with unmet needs.

Eligibility

The requirements and qualifications that an applicant must meet to participate in the interim housing program.

Household

All individuals who resided in the pre-disaster address who are collectively represented by the primary applicant in the application, and may reside in the HIHP unit(s) associated with that application.

Additionally, if new household members (who were not part of the pre-disaster household) will reside in the HIHP-provided unit, the names must be provided to HIHP and reasons for the addition of the household member must be disclosed.

Interim Housing Eligibility Database (IHED)

Database used by Criteria Review Team to receive and track applications. The database utilizes Tidal Basin's Phoenix OneCase software and user interface.

Notice

Written program communication sent to an applicant regarding their eligibility or program status.

Phoenix OneCase (P1C)

Proprietary application software that supports the Interim Housing Eligibility Database.

Property Manager

A person or organization that manages one or more interim Program sites.

7. Application Process

7.1. Applications

Applicants must complete an application to HIHP to be considered for the RDU Initiative.

7.2. Application Process

Applicants in HIHP will be considered for the RDU Initiative based on information collected in their application, including, but not limited to:

- Ownership of pre-disaster residence
- Location of pre-disaster address
- Household size
- Household composition

Although the State may request additional information from applicants related to the RDU Initiative, the State does not have an independent application process for the RDU Initiative.

7.3. Prioritization within HIHP

The RDU Initiative prioritizes outreach to applicants who own properties that clear a preliminary desk review of feasibility of RDU placement.

Following the initial outreach to applicants, the RDU Initiative reserves the right to prioritize RDU placement based on the following considerations:

- cost of RDU placement on the site
- cost of RDU maintenance on the site
- general site conditions
- road access
- feasibility of permanent RDU placement
- household composition relative to available RDU unit sizes and lot size
- applicant's interest in permanent RDU placement.

7.4. Impact to HIHP Benefits

Declining to enroll in the RDU Initiative will not preclude that applicant from receiving or continuing to receive benefits through HIHP at other HIHP sites.

8. Applicant Enrollment in RDU Initiative

Criteria have been established to ensure that interim housing is made available under this program only to households with documented needs related to the 2023 Maui Wildfires.

8.1. Enrollment Criteria

Pre-disaster residents of Maui County who, at the point of application, document an interim housing need related to the 2023 Maui Wildfires (FEMA DR-4724-HI) are eligible for HIHP and may be considered for the RDU Initiative.

8.1.1 HIHP Eligibility

The applicant must meet the eligibility requirements of HIHP to be enrolled in the RDU Initiative. The applicant must meet the eligibility criteria established HIHP Policy in effect at the time.

8.1.2 Proof of Ownership

The applicant must own the property.

The State will use property tax records to independently identify the owners of the property. If the State is unable to identify the owners through public records, then the applicant will be asked to document ownership.

If the State is unable to independently verify ownership of the property, the applicant must provide:

- Deed or Official Record

If one or more owners of the property will not reside in the RDU, the applicant must provide written documentation that the owner(s) who do not reside on the property consent to the RDU placement. If the applicant's household composition does not include, at a minimum, every individual owner listed on the property tax record, deed, or other official record, then the applicant must provide:

- Notarized letter(s) from every owner who is not on the application that states the owner is aware and consents to the RDU placement
- Death certificate for the owner(s), as applicable

If the property is not under the ownership of individuals (e.g., trusts, limited liability companies, etc.), the State will request additional proof of ownership on a case-by-case basis.

8.1.3 Primary Residency

The applicant must maintain the RDU as a primary residence for the duration of the time in which the applicant is displaced from a permanent option on the pre-disaster property.

After installation of the unit, the applicant may be required to provide proof of primary residency at any point in time, including, but not limited to recertification. The applicant may be required to provide at least one of the following documents:

- Utility bill (electric, water/sewer, etc.) that shows ongoing usage
- Driver's license or State-issued identification card
- Voter registration card
- Motor vehicle registration

As needed, the applicant may also be asked to provide proof of primary residency for every household member listed in the application.

8.1.4. Good Standing

The applicant must maintain good standing with any other conditions of homeownership for the duration of receiving benefits from the RDU Initiative. This requirement includes, but is not limited to, timely mortgage payments (as applicable), timely utility payments, timely payment of property taxes, maintenance of homeowner insurance coverage, and compliance with zoning requirements.

The applicant must disclose any loans or liens that could impact the applicant's good standing, including, but not limited to:

- Mortgage(s)
- Home Equity Lines of Credit
- Liens on the property
- Past due balances on utilities related to the property
- Past due balances on property taxes
- Status of homeowner insurance
- Civil lawsuits involving the property

At a minimum, the applicant must provide:

- Mortgage statement dated within 60 days of request
- Most recent water statement or applicant attestation that service has not been reactivated
- Most recent electricity statement or applicant attestation that service has not been reactivated
- Most recent property tax statement (if not included in mortgage)

Documents provided by the applicant may reflect a current balance. However, the State may require additional proof of ability to pay if the statements also reflect past due balances.

The State may end the applicant's benefits in the event that the applicant is not in good standing in a manner that impacts the maintenance of the RDU (e.g., the property is in foreclosure).

8.1.5. Compliance with Right of Entry

The applicant must consent in writing to a property assessments and site visits related to site preparation, placement of the RDU, removal of the RDU (if applicable), and any other visits required by the State.

9. Pathway Determination

The applicant may be offered one or more RDU pathways as part of the RDU Initiative.

9.1. Offer of Temporary and/or Permanent Pathway

The applicant may be offered a Temporary and/or Permanent RDU placement. Appendix C includes a workflow of the process. The workflow is not exhaustive.

A summary of decision points is included in the table below for reference. This table is not exhaustive.

	Temporary Pathway	Permanent Pathway
<i>Temporary installation is feasible on the site.</i>	X	
<i>Permanent installation is feasible on the site.</i>	X	X
<i>The applicant plans to live in the RDU indefinitely.</i>		X
<i>The applicant prefers to have the RDU removed after constructing a permanent residence on the property.</i>	X	

<i>The applicant commits to accepting HIHP-eligible applicants as renters.</i>	X	X
<i>The applicant is interested in long-term ownership of the RDU.</i>		X

9.2. Method of Pathway Offer

The applicant will be offered the pathway options via a written letter sent through IHED and email. The applicant will have thirty (30) calendar days to sign the offer.

At a minimum, the letter will include:

- Description of temporary and/or permanent pathway offer(s)
- General descriptions of requirements and limitations of each pathway in the offer
- Timeline for installation

Please note that the pathway offer letter is not an exhaustive list of all program requirements and is intended to inform the applicant of the pathways available for that property.

10. Temporary Pathway

The Temporary Pathway can be offered to applicants with properties that are not compatible with permanent RDU installation and/or applicants who decline the Permanent Pathway.

10.1. Duration of Use

For any homeowner in the Temporary Pathway, the RDU Initiative will install a RDU on the applicant's property prior to construction of the permanent dwelling on the same property. The RDU may remain on the property for the duration of construction or the duration of any applicable permitting or zoning restrictions, whichever is more restrictive.

Subject to applicable permitting or zoning restrictions, the duration of use may be extended upon agreement between the homeowner and the State beyond the construction period when a homeowner provides access to the State to rent the unit to a HIHP-eligible household at an agreed upon rental rate.

10.2. Rental Option

If the applicant agrees to provide access to the State to rent the RDU, the applicant must agree that the rental rate may be below market rate.

The applicant's right to refuse access to rent to a proposed HIHP-eligible household will be limited to verifiable reasons that could negatively impact the applicant's health, safety, and/or housing stability (e.g., applicant has allergy to dogs and the proposed tenants have pet dogs).

The applicant is required to pay any taxes incurred by accepting the rent payments.

10.3. Ownership of RDU

In the Temporary Pathway, the State maintains ownership of the RDU.

10.4. Transition to Permanent Pathway

Enrollment in the Temporary Pathway will not preclude the applicant from consideration of the Permanent Pathway.

This transition must be agreed upon by the State and the applicant and is subject to factors that may be outside of the State and applicant's control (e.g., feasibility of permanent installation).

To pursue this option, the applicant must request to transition to the Permanent Pathway prior to scheduling the removal of the RDU.

11. Permanent Pathway

The Permanent Pathway is offered to applicants with properties that are compatible with permanent RDU installation.

11.1. Duration of Use

For any homeowner in the Permanent Pathway, RDU Initiative will install a RDU on the applicant's property prior to construction of the permanent dwelling on the same property. The RDU may remain on the property indefinitely, subject to any permitting or zoning restrictions.

As an alternative to building a permanent structure, the applicant may elect to reside in the RDU without attempting to construct another dwelling on the property.

11.2. Ownership of RDU

In the Permanent Pathway, the State maintains ownership of the RDU for a period of five (5) years following placement on the owner's property. The applicant will be offered a non-payable loan with a declining balance lien that is fully forgiven after maintaining compliance with this the RDU Initiative, HIHP, and all related requirements for five years.

For example, if an applicant moves into the RDU and completes construction of a permanent dwelling on the property within three (3) years, then the applicant must make the RDU available for the State to place HIHP-eligible applicants in that RDU for the remaining two (2) years of the term at the set rental rate.

11.3. Occupancy of the RDU

For the five-year period after RDU placement, the applicant must reside in the RDU and/or provide access to the State to rent the unit to a HIHP-eligible household at an agreed upon rental rate.

After five years, the applicant may use the RDU for long-term residential rental use, subject to any other constraints (e.g., zoning).

11.4. Rental Option

The rental rate may be below market rate.

The applicant's right to refuse access to rent to a proposed HIHP-eligible household will be limited to verifiable reasons that could negatively impact the applicant's health, safety, and/or housing stability (e.g., applicant has allergy to dogs and the proposed tenants have pet dogs).

The applicant is required to pay any taxes incurred by accepting the rent payments.

11.5. Sale of RDU to Applicant

If the applicant does not comply with program requirements for the five-year period, the applicant agrees to allow access to the State to remove the RDU or directly purchase the RDU from the State at the lien balance at that point in time.

The State may consider extenuating circumstances on a case-by-case basis.

11.6. Coordination with the County of Maui

As the objective of the RDU Initiative is to create long-term housing options, the State intends to promote residential use of the RDUs.

At the point of sale, the State will recommend in writing to the County of Maui that the County deny any permit for short-term rental home on the property for the duration of time that the RDU remains on the property.

The State will defer to the County of Maui on issuance and enforcement of the short-term rental home permits within the County.

11.7. Transferable Warranty

The State, or the State's assigned vendor, will maintain the warranty until the State transfers ownership to the applicant. At the point of ownership transfer, any warranties that remain in effect related to the unit will also transfer to the applicant.

11.8. Transition to Temporary Pathway

Due to construction standards for permanent installation, the applicant will be unable to transition to the Temporary Pathway after placement of the RDU via the Permanent Pathway.

12. Long-Term Housing Plan

The applicant must disclose their long-term housing plan and any changes to that plan as needed.

12.1. Applicant Maintains RDU as Permanent Housing

If the applicant accepts an offer for the Permanent Pathway and the applicant intends to remain in the RDU indefinitely, the State may require the applicant continue to document residential use of the RDU through recertifications and site visits until the sale of the RDU is complete.

12.2. Applicant Builds Permanent Structure on Property

If the applicant continues to pursue building a permanent structure on the property (separate from the RDU), the State may require that the applicant document the process prior to any sale of the RDU to the applicant or removal of the RDU from the property, whichever may occur first.

The State may require information, including, but not limited to the following:

- Documentation of participation in another government-funded program (including award amounts and timeline)
- Building plans (limited to circumstances in which there is reasonable concern that construction on the property could impact the structural integrity of the RDU and/or access to the RDU)
- Grant agreements or loans that the applicant signs for any other government-funded program related to housing on the site

13. DCMP

Applicants are required to enroll in the Disaster Case Management Program (DCMP) if they have not already done so prior to applying to HIHP. As part of HIHP, the applicant must agree to allow their information to be shared with the Disaster Case Management Program (DCMP). The applicant must participate with DCMP as directed by the State.

The HIHP Data Team will send a list of all new HIHP applicants to the DCMP once per week. The DCMP will advise whether each applicant is enrolled in DCMP.

For applicants not yet enrolled in DCMP, HIHP will notify the applicant that they must enroll in DCMP immediately.

The Program reserves the right to institute future requirements for compliance with DCMP. The Program will notify applicants at least 30-day in advance of any new requirements related to DCMP participation.

14. Maintenance of the RDU

The applicant must maintain the RDU to the standards set forth by the State in all written agreements.

15. Compliance with Program

The applicant and household members must comply with the requirements, policies, and requests of the RDU Initiative, HIHP, the requirements, policies, and applicable County, State and/or federal laws. Non-compliance may result in removal of the RDU and/or monetary penalties.

16. Payments to the Program

The applicant is not responsible for any payment to the State or State's vendors to complete an application, submit an application, appeal a decision, or complete a background check.

16.1. Utility Payments

The applicant is responsible for all utility payments on the property. The applicant will pay the utility providers and servicers directly.

16.2. Costs of Installation

The applicant may be responsible for a portion of the installation costs that exceed the State's contribution towards the costs of installation. The applicant must be informed of these costs prior to scheduling the installation of the unit. The applicant will submit payment to the State or an assigned vendor of the State.

16.3. Other Payments to Maintain the Property

The applicant is responsible for any other payment required to maintain the property, including, but not limited to, mortgage payments, property taxes, and homeowner's insurance.

16.4. Purchase of RDU

In the event that the applicant elects to purchase the RDU, the applicant will submit payment to the State or an assigned vendor of the State. The State has the right to remove the unit at any point prior to sale of the RDU to the applicant.

17. Functional & Access Needs Accommodations

The State aims to provide reasonable accommodations to any eligible applicant who requests assistance for functional and access needs.

The State will assess the functional and access accommodation requests to determine the preferred course of action, which may include but is not limited to altering an available unit or identifying another housing unit, location, or housing pathway for the household.

17.1. Purpose of Access and Functional Needs Accommodations

In the HIHP application, applicants are asked a series of questions or determine their needs for housing-related accommodations. These questions and prompts include, but are not limited to:

- Does anyone in your household have a service animal?
- Does anyone in your household have a mobility accommodation need?
- Does anyone in your household have a visual or hearing accommodation need?
- Does your household have other needed accommodations?
 - If Yes, please describe.

The responses to these questions do **not** impact an applicant's eligibility for HIHP or the RDU Initiative within HIHP. A perceived or known disability of the primary applicant or a member of the household will **not** impact the eligibility review.

In order to assess the proper accommodation, the CRT or Placement Coordinator may inquire about the following:

- Information to verify that the applicant meets the Fair Housing Act's definition of disability. This information can be provided by the applicant, a doctor or medical professional, a peer support group, or a non-medical service provider. Typically, a person's medical records will **not** be required.
- Information required to evaluate if the request is necessary because of the applicant's disability
- Information to enable the program to evaluate the disability-related need for the accommodation
- Information that describes the required accommodation
- Information that demonstrates the relationship between the applicant's disability and the requested accommodation.

The program will request the minimum information necessary to identify a unit for the household.

17.2. Requesting an Accommodation

Applicants are asked about their function and access needs when they complete the application. However, an applicant may request an accommodation at any point in the process by notifying the CRT, Placement Coordinator, or Contact Center. The applicant may also notify their assigned Case Manager (in DCMP), who may contact HIHP on the applicant's behalf.

17.3. Documenting the Request

The CRT and Placement Coordinator will request documentation about how the applicant or household member's disability is related to the accommodation request. (Please note that the applicant is not required to disclose any details on a medical diagnosis.) For example, the applicant may provide a letter from her doctor that states the applicant is dependent on a walker and would benefit from a housing unit without stairs for her health and safety. If the applicant is unable to provide a document from an independent source (e.g., medical provider), then the applicant will self-attest to the accommodation request.

If the disability is readily apparent to the Program, then the applicant will not be required to submit documentation. However, the Program will request a self-attestation.

The Program will assess whether the request is reasonable given the scope of the program. For example, the program may deny a request that is unrelated to housing.

17.4. Identifying a Unit

If the State (or the State's assigned vendor) is unable to identify an existing unit or is unsure of how the request aligns with the specifications of the units, the State will make alterations to the unit, as long as the accommodation does not create an undue financial and administrative burden.

The State will determine whether the requested accommodation will present an undue financial and administrative burden. To determine whether a request presents an undue financial and administrative burden, the State will consider factors including, but not limited to, the costs of the requested accommodation, the financial resources of the Program, the benefits the accommodation would provide, and the availability of alternative accommodations that would meet the disability-related needs.

17.5. Alternate Housing Solution

If the State determines that the requested accommodation will present an undue financial and administrative burden, the State will place the applicant in a suitable State-managed site instead.

18. Applicant Recertifications

The Program may implement a recertification process to determine ongoing housing needs for applicants in the RDU Initiative. As part of the recertification, the State may require that the applicant comply with additional conditions to continue to receive assistance.

19. Appeals

The State will provide RDU benefits at their sole discretion to eligible HIHP applicants.

Appeals based on eligibility determinations are covered by the overall HIHP policy in effect at the time.

20. Termination of Rental Agreement

In cases in which the State places a HIHP-eligible household in the RDU as a rental unit, the renters remain subject to relevant laws and regulations pertaining to private property, as well as their HIHP rental agreement. The renters will abide by the more restrictive regulation, law, or rule in any given circumstance.

Should a renter household be found in non-compliance with the conditions outlined in the HIHP rental agreement or private property regulations and/or laws, their rental agreement may be terminated.

The termination of the rental agreement is not an appealable action. To remain eligible for HIHP, the household must not have been previously removed from any HIHP unit, including units provided as part of the RDU Initiative, for a violation of rules and/or requirements that apply to all active HIHP sites.

21. Maintenance Requests

The applicant is responsible for maintaining the RDU.

If the applicant encounters a potential manufacturer issue while the RDU remains under State ownership, the applicant may submit a request to the State through the Contact Center.

22. Compliance

The Program will maintain compliance with the policy to ensure transparency and fairness.

23. Quality Assurance and Quality Control

The Program's Quality Assurance and Quality Control measures will be monitored under HIHP's overall plans.

24. Prevention of Fraud, Waste, and Abuse

Any employee will report suspected fraud, waste, and abuse to the Hawai'i State Ethics Commission. Additional information may be found here: <https://ethics.hawaii.gov/anti-fraud/>.

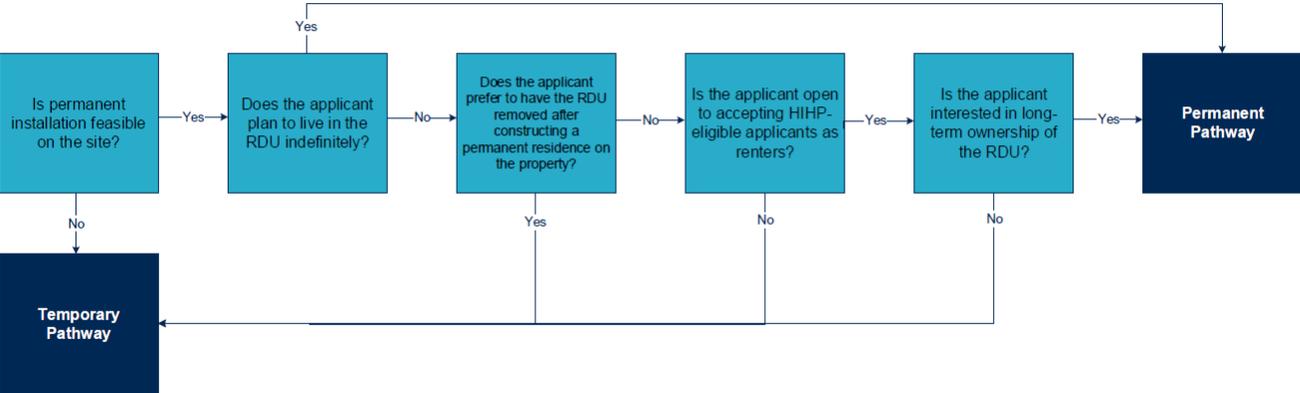
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25. Appendices

- Appendix A: HIHP Policy V4
- Appendix B: HIHP SOP V2
- Appendix C: Pathway Determination Workflow
- Appendix D: Right of Entry Form

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Appendix C



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Interim Housing Program: Residential Dwelling Program Policy

Maui Wildfire Recovery

January 31, 2025

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Authorization

Document Owner	Hawai'i Office of Recovery and Resiliency (HI-ORR)
Department Project Manager	Luke Meyers
Approved By	
Date Originated	January 21, 2024

Version Control

Version	Significant Changes	Approved	Effective Date
0	Initial Version		

Purpose

This document contains the formal policy guidance of the Residential Dwelling Unit (RDU) Program as administered by the Hawaiian Office of Recovery and Resiliency (HI-ORR). HI-ORR, its agents, employees, contractors and subcontractors are collectively referred to as “the State” for the purposes of this policy.

The RDU Program operates within the Hawai'i Interim Housing Program (HIHP). HIHP provides direct interim housing assistance to eligible applicants who were impacted by the 2023 Maui Wildfires (FEMA DR-4724-HI). The RDU Program provides prefabricated dwelling units to eligible HIHP applicants to enable those applicants to return to their pre-disaster properties.

HIHP was launched in July 2024. Within HIHP, the RDU Program was launched in December 2024. The end date will be determined by HI-ORR.

This document will be adjusted as needed by HI-ORR to reflect updates to the policies included. Any changes to this document must be approved by HI-ORR or an authorized representative in writing.

Key Terms

Applicant	An individual who has applied to HIHP for interim housing assistance.
Hawai'i Interim Housing Program (HIHP)	A housing program that provides direct interim housing assistance to pre-disaster residents of Maui County who, at the point of application, document an interim housing need related to the 2023 Maui Wildfires (FEMA DR-4724-HI).
Residential Dwelling Unit (RDU)	A prefabricated residential unit installed on the premises of an eligible HIHP applicant.
Premises	The lot of land owned by the applicant where the applicant's home was located pre-disaster and where the RDU will be installed.

1. Applications

Applicants must complete an application to HIHP to be considered for the RDU Program.

1.1 Application Process

Applicants in HIHP will be considered for the RDU Program based on information collected in their application. Although the State may request additional information from applicants related to the RDU Program, the State does not have an independent application process for the RDU Program.

1.2 Prioritization within HIHP

The RDU Program prioritizes outreach to applicants who own properties that clear a preliminary desk review of feasibility.

Following the initial outreach to applicants, the RDU Program reserves the right to prioritize RDU placement based on the following considerations: cost of RDU placement on the site, cost of RDU maintenance on the site, general site conditions, road access, feasibility of permanent RDU placement, household composition relative to available RDU unit sizes and lot size, and applicant's interest in permanent RDU placement.

1.3 Impact to HIHP Benefits

Declining to enroll in the RDU Program will not preclude that applicant from receiving or continuing to receive benefits through HIHP.

2. Applicant Enrollment

Pre-disaster residents of Maui County who, at the point of application, document an interim housing need related to the 2023 Maui Wildfires (FEMA DR-4724-HI) are eligible for HIHP and, as a result, may be considered for the RDU Program.

2.1. HIHP Eligibility

The applicant must meet the eligibility requirements of HIHP to be enrolled in the RDU Program.

2.2 Homeownership

The applicant must be a homeowner. Specifically, the applicant must be the owner of the premises and the home damaged or lost due to the declared disaster.

If one or more owners will not reside in the RDU, the applicant must provide written documentation that the owner(s) who do not reside on the property consent to the RDU placement. The applicant is solely responsible for obtaining such consent.

2.3 Primary Residency

The applicant must maintain the RDU as the primary residence for the duration of the time in which the RDU is installed on the premises or the duration of the program, whichever is more restrictive. Only household members named in the HIHP application may reside in the RDU.

2.4 Good Standing

The applicant must maintain good standing with any other conditions of homeownership for the duration of participation in the RDU Program. This requirement includes, but is not limited to, timely mortgage payments (as applicable), timely utility payments, timely payment of property taxes, maintenance of homeowner insurance coverage, and compliance with zoning requirements.

The State may end the applicant's benefits in the event that the applicant is not in good standing in a manner that impacts the maintenance of the RDU (e.g., the property is in foreclosure).

2.5 Compliance with Right of Entry

The applicant must consent to the License and Occupancy Agreement and the Right-of-Entry terms outlined within it. The Right-of-Entry permission ends at the expiration of the agreement or when the applicant revokes permission.

2.6 Duplication of Benefits

The applicant is subject to any policy or procedure regarding duplication of benefits in effect for the overall HIHP program.

3. RDU Placement

Eligible applicants will be offered temporary RDU placement with the potential for future permanent installation.

3.1 Duration of Use

The RDU Program will install a RDU on the premises prior to construction of the permanent dwelling, which will be pursued by the applicant independent to the RDU Program. The RDU may remain on the premises for the duration of construction or the duration of any applicable permitting or zoning restrictions, whichever is more restrictive.

The applicant is not required to attempt to construct another dwelling on the premises to participate in the RDU Program.

3.2 Residential Use

The use of the RDU is reserved for dwelling purposes only.

3.3 Ownership of RDU

The State maintains ownership of the RDU.

3.4 Licensing of RDU

In accordance with the License and Occupancy Agreement, the State is the licensor of the RDU and the applicant is the licensee of the RDU.

3.5 Transition to Permanent Placement

Temporary placement will not preclude the applicant from permanent placement. The transition to permanent placement must be agreed upon by the State and the applicant and is subject to factors that may be outside of the State and applicant's control (e.g., feasibility of permanent installation).

3.6 Warranties

The State will maintain the applicable warranties.

3.7 Placement on Premises

The RDU will be placed on the premises. The applicant is responsible for notifying the State of any plans regarding future construction on the premises in advance of RDU installation.

The State will not move the location of the RDU within the premises after installation.

3.8 Removal of RDU

The State may remove the RDU from the premises at any time, including, but not limited to the following circumstances: the applicant requests that the RDU is removed from the premises; the applicant completes construction of a permanent dwelling on the premises; the applicable permitting or zoning restrictions require the removal; the State ends operation of the RDU Program; the State ends operation of HIHP; failure of applicant to maintain the RDU in accordance with written agreements; and applicant non-compliance with HIHP.

4. Conditions of Continued Participation

The applicant must meet conditions to continue to receive housing assistance.

4.1 DCMP

The applicant must agree to allow their information to be shared with the Disaster Case Management Program (DCMP). The applicant must participate with DCMP as directed by the State.

4.2 Maintenance of the RDU

The applicant must maintain the RDU to the standards set forth by the State in the License and Occupancy Agreements and all applicable written agreements.

4.3 Permits and Certificates for Permanent Installation

If the applicant and the State agree to proceed to a permanent installation, the applicant is responsible for applying and obtaining the necessary building permits and occupancy certificates.

4.4 Compliance with Program

The applicant and household members must comply with the requirements, policies, and requests of the RDU Program, HIHP, the requirements, policies, and applicable County, State, and/or federal laws. Non-compliance may result in removal of the RDU and/or monetary penalties.

4.5 Prohibition of Third Parties

The applicant is prohibited from allowing individuals who are not named household members to reside in the RDU for the duration of the applicant's participation in the program. Within seven (7) days of a change in household (e.g., birth, death, etc.), the applicant is responsible for contacting the RDU Program to request, subject to State approval, an updated License and Occupancy agreement.

4.6 Prohibition of Leases and Sub-Licensing

The applicant is prohibited from leasing or sub-licensing the use of the RDU for the duration of the applicant's participation in the program.

4.7 Revocation of License and Occupancy Agreement

The applicant and household members named in the License and Occupancy Agreement will comply with any notice of revocation by the State. The applicant is responsible for ensuring that the household vacates the RDU by moving out and surrendering possession of the RDU no later than the date indicated by the State.

The applicant is also responsible removing all personal property from the RDU in the event of a revocation of agreement.

4.8 Additional Requirements

The Program reserves the right to implement additional requirements for applicants during the period of performance for the RDU Program.

5. Payments to the Program

The applicant is not responsible for any payment to the State or State's vendors to complete an application, submit an application, appeal a decision, or complete a background check.

5.1 Utility Payments

The applicant is responsible for all utility payments, including deposits, on the premises. The applicant will pay the utility providers and servicers directly.

Costs of Temporary Installation

The applicant is not responsible for any payment to the State for the installation or use of the RDU for the duration of the applicant's participation in the program. However, the applicant may be required to reimburse the State for costs in the event that the applicant is in violation of the program terms.

5.2 Costs of Permanent Installation

If the applicant and the State agree to proceed to a permanent installation, the applicant is responsible for payment of any costs or fees associated with obtaining building permits and occupancy certificates.

5.3 Other Payments to Maintain the Property

The applicant is responsible for any other payment required to maintain the property, including, but not limited to, mortgage payments, property taxes, and homeowner's insurance.

6. Functional & Access Needs Accommodations

The RDU Program aims to provide reasonable accommodations to any eligible applicant who requests assistance for functional and access needs.

The RDU Program will assess the functional and access accommodation requests to determine the preferred course of action, which may include, but is not limited to, altering an available unit or identifying another housing unit, location, or housing pathway for the household.

7. Applicant Recertifications

The RDU Program may implement a recertification process to determine ongoing housing needs for the applicant. As part of the recertification, the State may require that the applicant comply with additional conditions to maintain the RDU on the property.

8. Appeals

The State will provide RDU benefits at their sole discretion to eligible HIHP applicants. Appeals based on eligibility determinations are covered by the overall HIHP policy in effect at the time.

9. Compliance

The Program will maintain compliance with the policy to ensure transparency and fairness.

9.1 Adherence to RDU Program and HIHP Policy

All active documents and processes must align with the policies outlined in the version of this document in effect and the version of the HIHP Policy in effect.

9.2 Amendments to RDU Program

This document will be adjusted as needed by HI-ORR. Any changes to this document must be approved by HI-ORR or an authorized representative in writing.

9.3 Quality Assurance and Quality Control

The Program's Quality Assurance and Quality Control measures will uphold the policies outlined in the version of this document in effect.

10. Prevention of Fraud, Waste, and Abuse

Any employee will report suspected fraud, waste, and abuse to the Hawai'i State Ethics Commission. Additional information may be found here: <https://ethics.hawaii.gov/anti-fraud/>.



Residential Dwelling Unit (RDU) Press Release

**GOVERNOR GREEN ANNOUNCES EXPANSION OF HIHP PROGRAM AND
RESIDENTIAL DWELLING UNITS (RDUS) FOR MAUI WILDFIRE SURVIVORS**

FOR IMMEDIATE RELEASE

[INSERT DATE]

HONOLULU – Governor Josh Green, M.D., is announcing the expansion of the [Hawai'i Interim Housing Program \(HIHP\)](#) to include a Residential Dwelling Unit (RDU) initiative that aims to help owners return to their properties quicker and provide additional housing for survivors in West Maui.

Six months ago on July 2, 2024, Maui residents displaced by the catastrophic wildfires of August 8, 2023 could apply for housing assistance through HIHP. HIHP includes several state-sponsored temporary housing sites dedicated to Maui wildfire recovery. These include, but aren't limited to: Ka La'i Ola, which is currently in construction in West Maui and will offer up to 450 modular homes when complete, and Hale 'O Lā'ie (formerly the Haggai Institute in Kīhei) which has more than 150 units.

The RDU initiative supports the goal of increasing housing and aiding Maui's recovery. It adds 55 more housing units directly into the community. These units are a mix of one- and two-bedroom prefabricated modular homes that will be placed on private lots with sufficient property capacity and utility connections. They are intended to serve as a temporary home directly on the property of displaced families in the burn area, thereby opening up space at Ka La'i Ola or Hale 'O Lā'ie, while fostering community rebuilding efforts.

[Insert quote from Governor Green]

Participation in the RDU initiative is contingent upon both homeowner eligibility and property feasibility.

Homeowner Eligibility Requirements

A homeowner may qualify for the RDU initiative if they meet the following eligibility criteria:

- The homeowner must be fully HIHP-eligible.
- The homeowner returns to their property pre- or during rebuild.
- The property meets county code (size, utilities, zoning). See the Property Feasibility section below for additional information.
- The homeowner must sign a Right-of-Entry (ROE) agreement and accept terms of use and license agreements.

Property Feasibility

To determine whether a private property is feasible for the RDU initiative, the program must confirm property ownership and size via tax records and check compliance with zoning and building codes. To inspect a potential property, the program will obtain a signed ROE from the homeowner and check the property to ensure:

- The property has sufficient space and utility connections for the RDU.
- The property clears a feasibility assessment (lot size, accessibility, setbacks, sewer and utility connections, and adherence to county zoning, safety, erosion, and floodplain regulations).

This initiative is overseen by the Hawai'i Office of Recovery and Resiliency (HI-ORR) in partnership with the State Department of Human Services (DHS), and County of Maui. Program funding will be sourced from state disaster funds.

For more information about this RDU initiative, visit [the HIHP homepage](#) or call the HIHP Contact Center at 808-727-1550 between 8AM and 6PM, Monday through Friday. Translation assistance is available for those with limited English proficiency.

###

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Hawai'i Interim Housing Program (HIHP)

Residential Dwelling Unit (RDU)

The Hawai'i Interim Housing Program (HIHP) was established by the State of Hawai'i (the State) to assist those displaced by the 2023 Maui wildfires by placing survivor households temporarily in emergency state-sponsored housing. To date the State has established Ka La'i Ola and Hale 'o Lā'ie which can house resident survivors in 610 units.

The State HIHP has begun investigating the feasibility of placing up to 55 Residential Dwelling Units (RDUs) on private lots for eligible HIHP property owners. RDUs are small, prefabricated, self-contained housing units that can be installed quickly, and as safely as possible, on properties with sufficient space and utility connections. The intent is to create a path that will expedite residents returning to properties sooner rather than later.



Example – One-bedroom Nanonest

Lahaina property owners who are eligible for HIHP assistance could benefit from an RDU installation, subject to the following conditions:

- Homeowner returns to their property to reside in the RDU prior to or during rebuild.
- The property has sufficient space and utility connections for the RDU.
- The property clears a feasibility assessment.
- Homeowner accepts the terms of the RDU Agreement and Understanding.

For additional information, click [here](#) to read the RDU Initiative FAQs.

To register your interest or for more information, please call the HIHP Contact Center at 808-727-1550. For general information about HIHP, visit dbedt.hawaii.gov/hhfdc/hawaiistaterecovers/





Appendix H

State Housing Fact Sheets and State Department Operational Housing Solutions

Subject	Date
Maui Wildfire Sheltering and Intermediate Housing Needs	February 2024
FEMA Permanent Housing Construction Program (PHC) for Maui Wildfire Recovery	February 2024



Maui Wildfire Sheltering and Intermediate Housing Needs



3,580 Households | Total Population Without Intermediate Housing Solution

1,734 Households in the Non-Congregate Sheltering (NCS) Program

State/County Funded

661 Households | Ineligible for FEMA Assistance

104 DHS State Rental Assistance Program

69 Council for Native Hawaiian Advancement Host Housing

33 Council for Native Hawaiian Advancement Kāko'o Maui

455 Remaining Need*

FEMA Funded

733 Households | Direct Lease Eligible

4 Offered the Direct Lease program but declined, primarily because of remote property locations, prompting the State to ask FEMA to consider commute times to work, schools, healthcare, and recovery resources when making new unit construction decisions

35 Booked by Direct Lease

694 Waiting on Place Direct Lease

FEMA Funded

340 Households | Rental Assistance Eligible

The Rental Assistance Program has committed to compensating landlords at 366% of the fair market rent (FMR) for their participation.

However, applicants are finding it challenging to locate suitable units because of the steep market prices, leading them to continue their stay in the Non-Congregate Sheltering (NCS) program.

Not in NCS

1,846 Households | Not in queue for FEMA assistance with Housing Need

1483 applicants have told FEMA they have a resource that might be unstable or temporary (like relying on family/friends). Therefore, many may seek state assistance again.

363 applicants have expressed their intention to secure a resource, yet they have not successfully obtained a solution. It is probable they will seek further assistance.

*Remaining Need: Non FEMA eligible disaster survivors not currently housed in another state funded program

Current Available Programs

Currently available State and FEMA programs providing housing assistance and resources for the Maui Wildfire disaster survivors.

STATE Programs Available DHS Rental Assistance Program
State Build Program
Council for Native Hawaiian Advancement

FEMA Programs Available Direct Housing
Rental Assistance Program
Site Build
Permanent Housing Construction

Why is there still a housing shortage?

Despite existing State and Federal programs, the housing shortage still persists, intensifying the demand for more sustainable, permanent housing solutions for survivors.

1 Housing shortages have been recognized by FEMA

2 Housing units near work, school, healthcare, and community support are unavailable

3 Available units are unaffordable

4 Construction of new units and permanent construction has not begun

5 Public housing units for low-to-moderate income families were also destroyed

FEMA's Role in Addressing Hawai'i's Housing Crisis

To resolve the housing shortage challenges, the State seeks the following support from FEMA.



Expedite placement of applicants into secured Direct Housing Units



Construction of new units

Efficient Outcomes for Survivors

Based on the extraordinary cost to run the NCS program, there may be a dual benefit of reducing long-term cost expenditures and shortening the timeframe to provide long-term sustainable housing solutions.



\$1M Daily cost of maintaining the NCS program



Advantages

- Survivors are more self-sufficient
- Regularly cooked meals
- Not worried about moving again



FEMA Permanent Housing Construction Program (PHC) for Maui Wildfire Recovery



Top 7 Reasons to Implement the PHC Program

In the wake of the devastating 2023 Maui wildfires, exploring all options for providing permanent housing to the survivors is imperative. A key solution is FEMA's Permanent Housing Construction (PHC) authority, which has been effectively used in past disasters to quickly provide safe, secure housing by constructing new units or repairing existing ones. This program operates in areas with a scarcity of housing resources, where traditional or temporary solutions are infeasible or not cost-effective, offering a crucial lifeline for those affected by such catastrophes.

1 Standard rental assistance is not feasible to solve the housing crisis created for disaster survivors.

FEMA's approval of Direct Housing Assistance shows that enough housing units were only available when the Fair Market Rent (FMR) was raised to 366% of HUD's standard rate, along with covering additional costs like parking, furniture rental, and service fees.

2 The housing market in Lahaina is unlikely to recover in a timely or cost-effective fashion without federal intervention.

The rebuilding process faces delays due to numerous steps, including reunification of remains, environmental reviews, historic preservation protocols, and changes in land use like road widening, requiring new surveys. This, combined with the slow permitting process managed by four state agencies and county officials, means lost housing units cannot be restored before temporary housing expires without Federal intervention.

3 The current supply chain and available skilled trades are not sufficient on island to rebuild the number of homes lost before the expiration of interim housing options.

A FEMA-led housing program will be more cost-effective and faster than traditional private sector construction in the impacted area due to unique challenges. These include delays from preconstruction processes on damaged lots, and the lack of water treatment and supply in non-burned areas, making them unsuitable for new housing without significant, time-consuming improvements to utilities and services.

4 The high prevalence of renters (*68%) in the displaced households compounds the housing recovery challenge as property owners might elect not to rebuild.

To sustainably house renters after disaster aid ends, more rentals at Fair Market Rent (FMR) are crucial. Accelerating construction for eligible owners on their original lots will free up rental resources. Thus, PHC can significantly improve long-term options for displaced renters.

5 Enhanced resilience and restored public trust in returning to the site of the devastating fires are achieved through permanent housing construction, laying a solid foundation for future disaster preparedness.

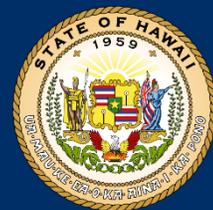
Units constructed with disaster-resistant materials in this fire-prone community can minimize future damage and displacement, following the highest fire-related fatality rate in over a century.

6 Promotes inclusivity and equity, ensuring that everyone has equal opportunities and is treated with respect and fairness.

PHC promotes inclusivity and fairness by addressing the needs of diverse disaster survivors, including those with accessibility needs, the elderly on fixed incomes, families with young children, and marginalized communities.

7 The PHC program empowers both state and county authorities to prioritize FEMA-eligible households in a manner that aligns with local objectives, respects cultural sensitivities, and addresses the distinctive needs and circumstances of the community.

The State's request for funding to build permanent housing for FEMA-eligible families acknowledges that some cannot afford or manage the move to permanent homes when temporary housing ends, enabling local government to tackle this issue.



Appendix I

HUD CDBG-DR

Subject	Agency/Office
Federal Register Notice	HUD

DEPARTMENT OF HOMELAND SECURITY**Federal Emergency Management Agency**

[Docket ID: FEMA 2024–0037; OMB No. 1660–0011]

Agency Information Collection Activities: Proposed Collection; Comment Request; Debt Collection Financial Statement**AGENCY:** Federal Emergency Management Agency, Department of Homeland Security.**ACTION:** 60-Day notice of extension and request for comments.

SUMMARY: The Federal Emergency Management Agency (FEMA), as part of its continuing effort to reduce paperwork and respondent burden, invites the general public to take this opportunity to comment on an extension, without change, of a currently approved information collection. In accordance with the Paperwork Reduction Act of 1995, this notice seeks comments concerning the collection of information related to disaster program accounts and debts owed to FEMA by individuals.

DATES: Comments must be submitted on or before March 17, 2025.**ADDRESSES:** To avoid duplicate submissions to the docket, please submit comments at <https://www.regulations.gov> under Docket ID FEMA–2024–0037. Follow the instructions for submitting comments.

All submissions received must include the agency name and Docket ID. Regardless of the method used for submitting comments or material, all submissions will be posted, without change, to the Federal eRulemaking Portal at <https://www.regulations.gov>, and will include any personal information you provide. Therefore, submitting this information makes it public. You may wish to read the Privacy and Security Notice that is available via a link on the homepage of <https://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: Andrew McCormick, Section Chief, Accounts Receivable, FEMA Finance Center, (540) 532–7501, drew.mccormick@fema.dhs.gov. You may contact the Information Management Division for copies of the proposed collection of information at email address: FEMA-Information-Collections-Management@fema.dhs.gov.

SUPPLEMENTARY INFORMATION: Under the Debt Collection Act as amended (31 U.S.C. 3701, *et seq.*), the Federal Claims

Collection Standards (31 CFR parts 900 through 904), and the Department of Homeland Security (DHS) regulations (6 CFR part 11), the Administrator of the Federal Emergency Management Agency (FEMA) is: (1) required to attempt collection of all debts owed to the United States arising out of activities of FEMA; and (2) for debts not exceeding \$100,000, authorized to compromise such debts or terminate collection action completely where it appears that no person is liable for such debt or has the present or prospective financial ability to pay a significant sum or that the cost of collecting such debt is likely to exceed the amount of the recovery (31 U.S.C. 3711(a)(2)). This information collection expired on June 30, 2025. FEMA is requesting an extension, without change, of a previously approved information collection for which approval has expired.

Collection of Information*Title:* Debt Collection Financial Statement.*Type of Information Collection:* Extension, without change, of a currently approved information collection.*OMB Number:* 1660–0011.*FEMA Forms:* Debt Collection Financial Statement, FEMA Form FF–600–FY–22–102 (formerly 127–0–1).

Abstract: FEMA Form FF–600–FY–22–102 (formerly 127–0–1) is used to collect information provided voluntarily by the debtor to evaluate the debtor's financial abilities to determine if they qualify for a payment plan and set repayment terms, or determine a compromise to write-off a debt in part or in full. Financial information obtained is essential to evaluate the debtor's ability for the payment of the debt in part or in full. Debt may be a recoupment of an ineligible disaster assistance payment or improper payment to an employee.

Affected Public: Individuals or Households.*Estimated Number of Respondents:* 140.*Estimated Number of Responses:* 140.*Estimated Total Annual Burden**Hours:* 105.*Estimated Total Annual Respondent Cost:* \$4,793.*Estimated Respondents' Operation and Maintenance Costs:* \$0.*Estimated Respondents' Capital and Start-Up Costs:* \$0.*Estimated Total Annual Cost to the Federal Government:* \$23,363.**Comments**Comments may be submitted as indicated in the **ADDRESSES** caption

above. Comments are solicited to (a) evaluate whether the proposed data collection is necessary for the proper performance of the Agency, including whether the information shall have practical utility; (b) evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (c) enhance the quality, utility, and clarity of the information to be collected; and (d) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submission of responses.

Maile Rasco-Arthur,

Acting Records Management Branch Chief, Office of the Chief Administrative Officer, Mission Support, Federal Emergency Management Agency, Department of Homeland Security.

[FR Doc. 2025–00999 Filed 1–15–25; 8:45 am]

BILLING CODE 9111–19–P**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

[Docket No. FR–6512–N–01]

Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice (UN AAN)**AGENCY:** Office of the Assistant Secretary for Community Planning and Development, HUD.**ACTION:** Notice.

SUMMARY: This Allocation Announcement Notice announces \$12,070,701,000 of Community Development Block Grant—Disaster Recovery (CDBG–DR) funds made available by the Disaster Relief Supplemental Appropriations Act, 2025, for major disasters occurring in 2023 or 2024. This Allocation Announcement Notice identifies grant requirements for these funds, including requirements in HUD's CDBG–DR Universal Notice (“Universal Notice”) published in the **Federal Register**. The Universal Notice includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

DATES: *Applicability Date:* January 21, 2025.

FOR FURTHER INFORMATION CONTACT: Tennille Smith Parker, Director, Office of Disaster Recovery, Department of Housing and Urban Development, 451 7th Street SW, Room 7282, Washington, DC 20410, telephone number 202-708-3587 (this is not a toll-free number). HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech or communication disabilities. To learn more about how to make an accessible telephone call, please visit: <https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>. Facsimile inquiries may be sent to Ms. Parker at 202-708-0033 (this is not a toll-free number). Email inquiries may be sent to disaster_recovery@hud.gov.

SUPPLEMENTARY INFORMATION:

Table of Contents

- I. Allocations
- II. Use of Funds
- III. Overview of Grant Process
- IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements
- V. Duration of Funding
- VI. Assistance Listing Numbers (formerly known as the CFDA Number)
- VII. Finding of No Significant Impact
- Appendix A: Allocation Methodology

I. Allocations

The Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158) (“the 2025 Appropriations Act”), approved on December 21, 2024, makes available \$12,039,000,000 in new CDBG-DR funds. The 2025 Appropriations Act also provides that HUD allocate any unobligated no-year balances remaining from Public Laws 108-324, 109-148, 109-234, 110-252, 110-329, 111-212, 112-55, and 113-2 (the “Prior Appropriations Acts”) for the same purposes as these new funds. The sum of all unobligated balances from these Prior Appropriations Acts is

\$31,701,000. This brings the total funding available for 2023 or 2024 disasters to \$12,070,701,000.

These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster that occurred in 2023 or 2024. The 2025 Appropriations Act provides that \$78,850,000 of these amounts will be made available for these specific purposes: \$45,000,000 for salaries and expenses of the Office of Community Planning and Development, \$1,850,000 for HUD’s disaster recovery portal, \$7,000,000 for the Office of Inspector General, and \$25,000,000 for capacity building and technical assistance, leaving the remaining \$11,991,851,000 available for allocations to CDBG-DR grantees.

Of the \$11,991,851,000 made available, this notice announces \$11,889,437,000 in CDBG-DR allocations for disasters occurring in 2023 or 2024. HUD will allocate the remaining \$102,414,000 of available funds under a separate Allocation Announcement Notice that provides plus-up funding for disasters that occurred in January 2023 for which HUD previously allocated funding in a **Federal Register** notice published on November 27, 2023 at 88 FR 82982.

The 2025 Appropriations Act requires HUD to include with any final allocation for the total estimate of unmet need an additional 15 percent of that estimate for additional mitigation activities that reduce risk in the MID areas (see table 1). The 2025 Appropriations Act provides that grants shall be awarded directly to a State, unit

of general local government, or Indian Tribe at the discretion of the Secretary.

Pursuant to the 2025 Appropriations Act, HUD has identified MID areas based on the best available data for all eligible affected areas. A detailed explanation of HUD’s allocation methodology is provided in appendix A of this notice. To comply with requirements that all funds are expended in MID areas, Little Rock, AR; Broward County, FL; Ft. Lauderdale, FL; Hillsborough County, FL; Lee County, FL; Manatee County, FL; Orange County, FL; Pasco County, FL; Pinellas County, FL; St. Petersburg, FL; Sarasota County, FL; Volusia County, FL; Guam; Maui County, HI; Chicago, IL; Cicero, IL; Cook County, IL; St. Clair County, IL; Detroit, MI; Wayne County, MI; Asheville, NC; Harris County, TX; Houston, TX; and Spokane County, WA must use 100 percent of the total funds allocated to address unmet disaster needs and mitigation activities that benefit the HUD-identified MID areas identified in the last column in table 2.

All other grantees must use at least 80 percent of their allocations to address unmet disaster needs or mitigation activities that benefit the HUD-identified MID areas, as identified in the last column of table 2. These grantees may use the remaining 20 percent of their allocation to address unmet disaster needs or mitigation activities in those areas that the grantee determines are “most impacted and distressed” within an area that received a Presidential major disaster declaration (*i.e.*, grantee-identified MID areas) identified by the Federal Emergency Management Agency (FEMA) disaster numbers listed in column two of table 1. However, these grantees are not precluded from spending 100 percent of their allocation to benefit the HUD-identified MID areas if they choose to do so. Detailed requirements related to MID areas are provided in section III.D.2 of the Universal Notice.

TABLE 1—ALLOCATIONS FOR UNMET NEEDS AND MITIGATION ACTIVITIES UNDER PUBLIC LAW 118-158 FOR DISASTERS OCCURRING IN 2023 AND 2024

Year	FEMA Disaster No.	State	Grantee	Allocations for unmet needs under this notice from Public Law 118-158	CDBG-DR mitigation set-aside for amounts under this notice from Public Law 118-158	Total allocated under this notice from Public Law 118-158
2023 & 2024	4730; 4836	AK	State of Alaska	\$16,240,000	\$2,436,000	\$18,676,000
2023	4698; 4788	AR	State of Arkansas	51,346,000	7,702,000	59,048,000
2024	4698	AR	Little Rock, AR	18,170,000	2,725,000	20,895,000
2023 & 2024	4699; 4707; 4758	CA	State of California	362,258,000	54,339,000	416,597,000
2024 & 2024	4734; 4794; 4806; 4828; 4834	FL	State of Florida	804,690,000	120,704,000	925,394,000
2023	4709	FL	Broward County	25,410,000	3,812,000	29,222,000
2023	4709	FL	Ft Lauderdale, FL	76,566,000	11,485,000	88,051,000
2024	4828; 4834	FL	Hillsborough County	616,803,000	92,521,000	709,324,000
2024	4828; 4834	FL	Lee County	87,550,000	13,133,000	100,683,000

TABLE 1—ALLOCATIONS FOR UNMET NEEDS AND MITIGATION ACTIVITIES UNDER PUBLIC LAW 118–158 FOR DISASTERS OCCURRING IN 2023 AND 2024—Continued

Year	FEMA Disaster No.	State	Grantee	Allocations for unmet needs under this notice from Public Law 118–158	CDBG–DR mitigation set-aside for amounts under this notice from Public Law 118–158	Total allocated under this notice from Public Law 118–158
2024	4806; 4828; 4834	FL	Manatee County	219,749,000	32,962,000	252,711,000
2024	4834	FL	Orange County	29,006,000	4,351,000	33,357,000
2023 & 2024	4734; 4828; 4834	FL	Pasco County	509,308,000	76,396,000	585,704,000
2023 & 2024	4734; 4828; 4834	FL	Pinellas County	707,637,000	106,146,000	813,783,000
2023 & 2024	4734; 4828	FL	St. Petersburg, FL	139,030,000	20,854,000	159,884,000
2024	4806; 4828; 4834	FL	Sarasota County	182,690,000	27,404,000	210,094,000
2024	4834	FL	Volusia County	116,100,000	17,415,000	133,515,000
2023 & 2024	4738; 4821; 4830	GA	State of Georgia	231,066,000	34,660,000	265,726,000
2023	4715	GU	Guam	435,500,000	65,325,000	500,825,000
2023	4724	HI	Maui County	1,425,549,000	213,832,000	1,639,381,000
2024	4796	IA	State of Iowa	117,119,000	17,568,000	134,687,000
2023 & 2024	4728; 4749; 4819	IL	Chicago, IL	370,963,000	55,645,000	426,608,000
2023 & 2024	4728; 4749; 4819	IL	Cicero, IL	83,482,000	12,522,000	96,004,000
2023 & 2024	4728; 4749; 4819	IL	Cook County	212,315,000	31,847,000	244,162,000
2024	4819	IL	St. Clair County	77,855,000	11,678,000	89,533,000
2023	4704	IN	State of Indiana	6,663,000	1,000,000	7,663,000
2024	4817	LA	State of Louisiana	102,562,000	15,384,000	117,946,000
2024	4780	MA	State of Massachusetts	6,917,000	1,037,000	7,954,000
2024	4757	MI	State of Michigan	37,887,000	5,683,000	43,570,000
2024	4757	MI	Detroit, MI	301,621,000	45,243,000	346,864,000
2024	4757	MI	Wayne County	61,202,000	9,180,000	70,382,000
2023 & 2024	4697; 4727; 4790	MS	State of Mississippi	117,350,000	17,603,000	134,953,000
2024	4827	NC	State of North Carolina	1,241,843,000	186,277,000	1,428,120,000
2024	4827	NC	Ashville, NC	195,661,000	29,349,000	225,010,000
2024	4795; 4843	NM	State of New Mexico	119,285,000	17,893,000	137,178,000
2024	4777	OH	State of Ohio	12,275,000	1,841,000	14,116,000
2023 & 2024	4706; 4776	OK	State of Oklahoma	34,265,000	5,140,000	39,405,000
2024	4815	PA	State of Pennsylvania	12,713,000	1,907,000	14,620,000
2024	4829	SC	State of South Carolina	130,743,000	19,611,000	150,354,000
2024	4807	SD	State of South Dakota	13,370,000	2,005,000	15,375,000
2023 & 2024	4751; 4832	TN	State of Tennessee	74,555,000	11,183,000	85,738,000
2024	4781; 4798	TX	State of Texas	483,206,000	72,481,000	555,687,000
2024	4781; 4798	TX	Harris County	58,544,000	8,782,000	67,326,000
2024	4781; 4798	TX	Houston, TX	273,604,000	41,041,000	314,645,000
2024	4831	VA	State of Virginia	40,583,000	6,087,000	46,670,000
2023	4720	VT	State of Vermont	58,996,000	8,849,000	67,845,000
2024	4759	WA	Spokane County	38,393,000	5,759,000	44,152,000
Totals				10,338,640,000	1,550,797,000	11,889,437,000

TABLE 2—MOST IMPACTED AND DISTRESSED AREAS FOR DISASTERS OCCURRING IN 2023 AND 2024

Grantee	Minimum amount from Public Law 118–158 that must be expended in the HUD-identified “most impacted and distressed areas” in column 3	“Most impacted and distressed areas”
State of Alaska	\$14,940,800	Juneau (Borough) (ZIP code 99801); Lower Yukon Regional Education (ZIP code 99554).
State of Arkansas	47,238,400	Benton (County) (ZIP code 72756); Cross (County); Pulaski County).
Little Rock, AR	20,895,000	Little Rock.
State of California	333,277,600	Hoopa Valley Indian Reservation (ZIP code 95546); Merced (County); Monterey (County); San Benito (County) (ZIP code 95023); San Diego (County); San Joaquin (County) (ZIP code 95220); San Luis Obispo (County); Santa Cruz (County); Santa Cruz (County); Tulare (County); Tuolumne (County) (ZIP code 95370); Ventura (County).
State of Florida	740,315,200	Charlotte (County); Charlotte (County); Citrus (County); Collier (County) (ZIP code 34112); Columbia (County) (ZIP code 32055); DeSoto (County) (ZIP code 34266); Dixie (County); Duval (County) (ZIP code 32209); Hamilton (County) (ZIP codes 32052, 32053); Hernando (County) (ZIP code 34607); Highlands (County) (ZIP code 33870); Indian River (County) (ZIP code 32960); Lafayette (County) (ZIP code 32066); Lake (County); Leon (County); Levy (County) (ZIP codes 32625, 34498); Madison (County) (ZIP code 32340); Polk (County); Seminole (County) (ZIP code 32771); St. Lucie (County); Sumter (County) (ZIP codes 33597, 34785); Suwannee (County) (ZIP code 32060, 32064); Taylor (County).
Broward County, FL	29,222,000	Broward County.
Ft. Lauderdale, FL	88,051,000	Ft. Lauderdale.
Hillsborough County, FL	709,324,000	Hillsborough County.
Lee County, FL	100,683,000	Lee County.
Manatee County, FL	252,711,000	Manatee County.
Orange County, FL	33,357,000	Orange County.
Pasco County, FL	585,704,000	Pasco County.
Pinellas County, FL	813,783,000	Pinellas County.
St. Petersburg, FL	159,884,000	St. Petersburg.
Sarasota County, FL	210,094,000	Sarasota County.

TABLE 2—MOST IMPACTED AND DISTRESSED AREAS FOR DISASTERS OCCURRING IN 2023 AND 2024—Continued

Grantee	Minimum amount from Public Law 118–158 that must be expended in the HUD-identified “most impacted and distressed areas” in column 3	“Most impacted and distressed areas”
Volusia County, FL	133,515,000	Volusia County.
State of Georgia	212,580,800	Appling (County) (ZIP code 31513); Atkinson (County) (ZIP code 31642); Bacon (County) (ZIP code 31510); Berrien (County) (ZIP code 31639); Bryan (County) (ZIP code 31324); Burke (County); Candler (County) (ZIP code 30439); Clinch (County) (ZIP code 31634); Coffee (County); Columbia (County); Emanuel (County) (ZIP code 30401); Jeff Davis (County) (ZIP code 31539); Lanier (County) (ZIP code 31635); Laurens (County) (ZIP code 31021); Lowndes (County); Lowndes (County) (ZIP code 31601); McDuffie (County) (ZIP code 30824); Richmond (County); Spalding (County) (ZIP code 30223); Toombs (County) (ZIP codes 30436, 30474); Treutlen (County) (ZIP code 30457); Wheeler (County) (ZIP code 30428).
Guam	500,825,000	Guam (County-equivalent).
Maui County	1,639,381,000	Maui (County).
State of Iowa	107,749,600	Cherokee (County) (ZIP code 51012); Clay (County); Sioux (County); Woodbury (County) (ZIP code 51109).
Chicago, IL	426,608,000	Chicago.
Cicero, IL	96,004,000	Cicero.
Cook County	244,162,000	Cook County.
St. Clair County	89,533,000	St. Clair County.
State of Indiana	6,130,400	Sullivan (County) (ZIP code 47882).
State of Louisiana	94,356,800	Ascension (Parish) (ZIP code 70346); Assumption (Parish) (ZIP codes 70341, 70390); Jefferson (Parish); Lafourche (Parish); St. John the Baptist (Parish) (ZIP codes 70068, 70084); St. Mary (Parish); Terrebonne (Parish).
State of Massachusetts	6,363,200	Worcester (County) (ZIP code 01453).
State of Michigan	34,856,000	Macomb (County); Monroe (County) (ZIP code 48166); Oakland (County).
Detroit, MI	346,864,000	Detroit.
Wayne County	70,382,000	Wayne County.
State of Mississippi	107,962,400	Hinds (County); Humphreys (County) (ZIP code 39038); Humphreys (County) (ZIP code 39166); Jackson (County) (ZIP code 39563); Monroe (County) (ZIP code 38821); Scott (County); Sharkey (County).
State of North Carolina	1,142,496,000	Ashe (County); Avery (County); Buncombe (County); Burke (County); Caldwell (County) (ZIP code 28645); Cleveland (County) (ZIP code 28150); Haywood (County); Henderson (County); Madison (County) (ZIP code 28753); McDowell (County); Mecklenburg (County) (ZIP code 28214); Mitchell (County); Polk (County) (ZIP code 28782); Rutherford (County); Transylvania (County); Watauga (County); Yancey (County).
Ashville, NC	225,010,000	Ashville.
State of New Mexico	109,742,400	Chaves (County); Lincoln (County).
State of Ohio	11,292,800	Logan (County).
State of Oklahoma	31,524,000	Carter (County) (ZIP code 73401); McClain (County) (ZIP code 73010); Murray (County) (ZIP code 73086); Osage (County) (ZIP code 74002).
State of Pennsylvania	11,696,000	Tioga (County) (ZIP code 16950).
State of South Carolina	120,283,200	Aiken (County); Anderson (County); Greenville (County); Greenwood (County) (ZIP code 29646); Laurens (County) (ZIP code 29325); Spartanburg (County).
State of South Dakota	12,300,000	Union (County) (ZIP codes 57038, 57049).
State of Tennessee	68,590,400	Carter (County) (ZIP code 37643); Cocke (County); Greene (County) (ZIP code 37743); Johnson (County) (ZIP code 37683); Montgomery (County) (ZIP code 37042); Unicoi (County) (ZIP code 37650); Washington (County) (ZIP codes 37650, 37659).
State of Texas	444,549,600	Anderson (County) (ZIP code 75801); Bell (County) (ZIP codes 76501, 76502); Brazoria (County); Cooke (County) (ZIP code 76272); Dallas (County); Fort Bend (County); Galveston (County); Guadalupe (County) (ZIP code 78666); Hardin (County) (ZIP code 77656); Henderson (County); Hockley (County); Jasper (County) (ZIP code 75951); Jasper (County) (ZIP codes 75951, 75956); Kaufman (County) (ZIP code 75142); Liberty (County); Liberty (County) (ZIP code 77327); Matagorda (County); Montgomery (County); Montgomery (County); Polk (County) (ZIP code 77351); San Jacinto (County); San Jacinto (County) (ZIP codes 77331, 77371); Smith (County); Trinity (County) (ZIP code 75862); Tyler (County) (ZIP code 75979); Walker (County); Wharton (County) (ZIP codes 77437, 77488).
Harris County	67,326,000	Harris County.
Houston, TX	314,645,000	Houston.
State of Virginia	37,336,000	Giles (County) (ZIP code 24124); Washington (County) (ZIP code 24236).
State of Vermont	54,276,000	Lamoille (County) (ZIP code 05656); Washington (County).
Spokane County	44,152,000	Spokane County.

II. Use of Funds

Funds for disasters occurring in 2023 or 2024 announced in this notice are subject to the requirements of the Universal Notice, published on January 8, 2025, in the **Federal Register** at 90 FR 1754, including sections I through V and appendices A through C.

III. Action Plan Submission Process

As provided in section I.C.3. of the Universal Notice, published at 90 FR 1754, this Allocation Announcement Notice provides a process for Action Plan submittal. Within 90 days of the

applicability date of this notice, grantees are required to submit their Action Plan to HUD for review and approval. For all allocations announced in this Allocation Announcement Notice, HUD is requiring paper submission of the Action Plan. Grantees shall submit their Action Plan to their assigned Community Planning and Development (CPD) Specialist or other designated HUD CPD staff member, with a copy provided to disaster_recovery@hud.gov. HUD encourages grantees to use the Action Plan template available on the Universal Notice website at [https://](https://www.hud.gov/program_offices/comm_planning/cdbg-dr/universal_notice_grantees)

www.hud.gov/program_offices/comm_planning/cdbg-dr/universal_notice_grantees.

IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements

The 2025 Appropriations Act authorizes the Secretary to waive or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary, or use by the recipient, of these funds, except for requirements related to fair housing,

nondiscrimination, labor standards, and the environment. The Universal Notice describes rules, statutes, waivers, and alternative requirements that apply to allocations governed by this notice. For each waiver and alternative requirement in the Universal Notice the Secretary has determined that good cause exists, and the waiver or alternative requirement is not inconsistent with the overall purpose of title I of the HCDA. The waivers and alternative requirements provide flexibility in program design and implementation to support full and swift recovery following eligible disasters, while ensuring that statutory requirements are met.

Grantees may request additional waivers and alternative requirements from the Department as needed to address specific needs related to their recovery and mitigation activities. Grantees should work with the appropriate HUD CPD staff member to request any additional waivers or alternative requirements from HUD headquarters. The waivers and alternative requirements described below apply to all grantees under this notice. Under the requirements of the 2025 Appropriations Act, waivers and alternative requirements are effective five days after they are published in the **Federal Register** or on the website of the Department.

V. Duration of Funding

The Appropriations Act makes these funds available for obligation by HUD until expended. HUD waives the provisions at 24 CFR 570.494 and 24 CFR 570.902 regarding timely distribution and expenditure of funds and establishes an alternative requirement providing that each grantee must expend 100 percent of its allocation within six years of the date HUD signs the grant agreement. HUD may extend the time period in this alternative requirement and associated grant period of performance administratively, if good cause for such an extension exists at that time, as requested by the grantee, and approved by HUD. When the period of performance has ended, HUD will close out the grant and any remaining funds not expended by the grantee on appropriate programmatic purposes will be recaptured by HUD.

VI. Assistance Listing Numbers (Formerly Known as the CFDA Number)

The Assistance Listing Numbers (formerly known as the Catalog of Federal Domestic Assistance numbers) for the disaster recovery grants under

this notice are as follows: 14.218; 14.228.

VII. Finding of No Significant Impact

A Finding of No Significant Impact (FONSI) with respect to the environment has been made in accordance with HUD regulations at 24 CFR part 50, which implement section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332(2)(C)). The FONSI is available online on HUD's CDBG-DR website at https://www.hud.gov/program_offices/comm_planning/cdbg-dr. Due to security measures at the HUD Headquarters building, an advance appointment to review the docket file must be scheduled by calling the Regulations Division at 202-708-3055 (this is not a toll-free number). HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech or communication disabilities. To learn more about how to make an accessible telephone call, please visit <https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>.

Adrianne R. Todman,

Deputy Secretary Performing the Duties of the Secretary of HUD.

Appendix A

Allocation of CDBG-DR Funds to Most Impacted and Distressed Areas Due to Presidentially Declared Disasters Occurring in 2023 and 2024

Background

The Disaster Relief Supplemental Appropriations Act, 2025 (approved on 12/21/2024) appropriated \$12.039 billion for CDBG-Disaster Recovery funds (CDBG-DR) for disasters “that occurred in 2023 or 2024.” The law instructs HUD that the funds are “for the same purposes and under the same terms and conditions as funds appropriated under such heading in title VIII of the Disaster Relief Supplemental Appropriations Act, 2022 (division B of Pub. L. 117-43).”

The key statutory text related to the allocation in Public Law 117-43: “. . . for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation, in the most impacted and distressed areas resulting from a major disaster . . . *Provided*, That amounts made available under this heading in this Act shall be awarded directly to the State, unit of general local government, or Indian tribe (as such term is defined in section 102 of the Housing and Community Development Act of 1974 (42 U.S.C. 5302)) at the discretion of the Secretary: *Provided further*, That the Secretary shall allocate, using the best available data, an amount equal to the total

estimate for unmet needs for qualifying disasters under this heading in this Act: *Provided further*, That any final allocation for the total estimate for unmet need made available under the preceding proviso shall include an additional amount of 15 percent of such estimate for additional mitigation:”

This methodology applies to allocations for disasters occurring on or after January 1, 2023 and had been declared major disasters as of November 1, 2024. It reflects approximately \$11.992 billion under the Disaster Relief Supplemental Appropriations Act, 2025 after factoring in additional repurposed amounts and funds for capacity building and HUD administrative costs. The key statutory text from the Disaster Relief Supplemental Appropriations Act, 2025 is:

“For an additional amount for “Community Development Fund,” \$12,039,000,000, to remain available until expended, for the same purposes and under the same terms and conditions as funds appropriated under such heading in title VIII of the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43), . . . *Provided*, That the Secretary of Housing and Urban Development shall allocate all funds provided under this heading in this Act for the total estimate for unmet needs including additional mitigation for qualifying disasters and publish such allocations in the **Federal Register** no later than January 15, 2025: . . . *Provided further*, That unobligated balances remaining as of the date of enactment of this Act included under Treasury Appropriation Fund Symbol 86 X 0162 from Public Laws 108-324, 109-148, 109-234, 110-252, 110-329, 111-212, 112-55, and 113-2 shall also be available for the purposes authorized under this heading in this Act (except that the amount for each set-aside provided herein shall not be exceeded), notwithstanding the purposes for which such amounts were appropriated: *Provided further*, That of the amounts made available under this heading in this Act, \$45,000,000 shall be transferred to “Department of Housing and Urban Development—Management and Administration—Program Offices” for salaries and expenses of the Office of Community Planning and Development for necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts made available for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas resulting from a major disaster in this, prior, or future Acts (“this, prior, 4 or future disaster Acts”): *Provided further*, That of the amounts made available under this heading in this Act, \$1,850,000 shall be transferred to “Department of Housing and Urban Development—Information Technology Fund” for the disaster recovery data portal: *Provided further*, That of the amounts made available under this heading in this Act, \$7,000,000 shall be transferred to “Department of Housing and Urban Development—Office of Inspector General”

for necessary costs of overseeing and auditing amounts made available in this, prior, or future disaster Acts: Provided further, That of the amounts made available under this heading in this Act, \$25,000,000 shall be made available for capacity building and technical assistance, including assistance on contracting and procurement processes, to support recipients of allocations from this, prior, or future disaster Acts:"

Most Impacted and Distressed Areas

As with prior CDBG-DR appropriations, HUD is not required to allocate funds for all major disasters occurring in the statutory timeframes. HUD is directed to use the funds "in the most impacted and distressed areas." HUD has implemented this directive by limiting CDBG-DR formula allocations to grantees with major disasters that meet these standards:

(1) Individual and Households Program (IHP) designation. HUD has limited allocations to those disasters where the Federal Emergency Management Agency (FEMA) had determined the damage was sufficient to declare the disaster as eligible to receive IHP funding.

(2) Concentrated damage. HUD has limited its estimate of serious unmet housing need to counties and zip codes with high levels of damage, collectively referred to as "most impacted areas." For this allocation, HUD is defining most impacted areas as either most impacted counties—counties exceeding \$10 million in serious unmet housing needs—and most impacted Zip Codes—Zip Codes with \$2 million or more of serious unmet housing needs. The calculation of serious unmet housing needs is described below.

For disasters that meet the most impacted threshold described above, the unmet need allocations are based on the following factors summed together:

(1) Repair estimates for seriously damaged owner-occupied units without insurance (with some exceptions) in most impacted areas after FEMA and Small Business Administration (SBA) repair grants or loans

(2) Repair estimates for seriously damaged rental units occupied by very low-income renters in most impacted areas;

(3) Repair and content loss estimates for small businesses with serious damage denied by SBA; and

(4) The estimated local cost share for Public Assistance Category C to G projects.

Methods for Estimating Serious Unmet Needs for Housing

The data HUD uses to calculate unmet needs for 2023 and 2024 qualifying disasters come from the FEMA IHP data on housing-unit damage as of November 20, 2024 and reflect disasters occurring in 2023 and declared on or before November 1, 2024.

The core data on housing damage for both the unmet housing needs calculation and the concentrated damage are based on home inspection data for FEMA's IHP and SBA's disaster loan program. HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the

estimated cost to repair those units less repair funds estimated to be provided by FEMA, SBA, and insurance.

Each of the FEMA IHP inspected owner units are categorized by HUD into one of five categories:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor;
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

When owner-occupied properties also have a personal property inspection or only have a personal property inspection, HUD reviews the personal property damage amounts such that if the personal property damage places the home into a higher need category over the real property assessment, the personal property amount is used. The personal property-based need categories for owner-occupied units are defined as follows:

- Minor-Low: Less than \$2,500 of FEMA inspected personal property damage.
- Minor-High: \$2,500 to \$3,499 of FEMA inspected personal property damage.
- Major-Low: \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

To meet the statutory requirement of "most impacted" in this legislative language, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA inspected real property damage of \$8,000 or above, personal property damage \$3,500 or above, or flooding 1 foot or above on the first floor.

Furthermore, a homeowner with flooding outside the 1 percent risk flood hazard area is determined to have unmet needs if they reported damage and no flood insurance to cover that damage. For homeowners inside the 1 percent risk flood hazard area, homeowners without flood insurance with flood damage below the greater of national median or 120 percent of Area Median Income are determined to have unmet needs. For non-flood damage, homeowners without hazard insurance with incomes below the greater of national median or 120 percent of Area Median Income are included as having unmet needs. The unmet need categories for these types of homeowners are defined as above for real and personal property damage.

FEMA IHP does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage.

Each of the FEMA-inspected renter units are categorized by HUD into one of five categories:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of "Moderate" damage by the FEMA inspector.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of "Major" damage by the FEMA inspector.
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of "Destroyed" by the FEMA inspector.

To meet the statutory requirement of "most impacted" for rental properties, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA personal property damage assessment of \$2,000 or greater or flooding 1 foot or above on the first floor.

Furthermore, landlords are presumed to have adequate insurance coverage unless the unit is occupied by a renter with income less than the greater of the Federal poverty level or 50 percent of the area median income. Units occupied by a tenant with income less than the greater of the poverty level or 50 percent of the area median income are used to calculate likely unmet needs for affordable rental housing.

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program based on a match comparing FEMA and SBA inspections by each of the FEMA damage categories described above.

If there is a match of 20 or more SBA inspections to FEMA inspections for any damage category, the median damage estimate for the SBA properties is used less the estimated average FEMA IHP repair grant and average SBA disaster loan grant weighted on take-up rates, which are generally high for IHP and low and for SBA. Except that no matched multiplier can be less than the 25th percentile for all IHP eligible disasters combined in eligible disaster years at the time of the allocation calculation or more than the 75th percentile for all IHP eligible disasters combined with data available as of the allocation.

If there is a match of fewer than 20 SBA inspections to FEMA inspections within individual damage categories for an individual disaster, these multipliers are used which are based on the 2020/2021 disaster years:

Disaster type	Multipliers by disaster type		
	Major-low	Major-high	Severe
Dam/Levee Break	\$33,007	\$47,078	\$47,078
Earthquake	27,141	33,714	134,503
Fire	22,971	82,582	134,503
Flood	47,074	57,856	64,513
Hurricane	36,800	45,952	45,952
Severe Ice Storm	33,528	33,714	36,592
Severe Storm(s)	22,971	37,299	37,299
Tornado	52,961	82,582	134,503

A separate multiplier is applied to mobile homes for all disaster types. The mobile home multipliers are \$77,058 for major-low, \$98,463 for major-high, and \$134,834 for severe.

Methods for Estimating Serious Unmet Economic Revitalization Needs

Based on SBA disaster loans to businesses using data for 2023 and 2024 disasters from as of November 19, 2024, HUD calculates the median real estate and content loss by the following damage categories for each disaster:

- Category 1: real estate + content loss = below \$12,000
- Category 2: real estate + content loss = \$12,000–\$29,999
- Category 3: real estate + content loss = \$30,000–\$64,999
- Category 4: real estate + content loss = \$65,000–\$149,999
- Category 5: real estate + content loss = \$150,000 and above

For properties with real estate and content loss of \$30,000 or more, HUD calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimates for the categories above by the number of small businesses denied an SBA loan, including those denied a loan prior to inspection due to inadequate credit or income (or a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

Because many of the larger disasters of 2023 and 2024 occurred recently and business need data remain incomplete for many disasters, no disaster in 2023 or 2024 receives for business unmet need less than 10 percent of their unmet housing need.

Methods for Estimating Unmet Infrastructure Needs

To calculate 2024 unmet needs for infrastructure projects, HUD received FEMA cost estimates on November 20, 2024 of the expected local cost share to repair the permanent public infrastructure (Categories C to G) to their pre-storm condition.

Because many of the larger disasters of 2023 and 2024 occurred recently and infrastructure need data remain incomplete for many disasters, no disaster in 2023 or 2024 receives for infrastructure unmet need of less than 10 percent of their unmet housing need.

Disaster Level Allocation Calculation

Once eligible entities are identified using the above criteria, the allocation to individual grantees represents their proportional share of the estimated unmet needs. For the formula allocation, HUD calculates total unmet recovery needs for eligible disasters as the aggregate of:

- Serious unmet housing needs in most impacted and distressed areas;
- Serious unmet business needs; and
- Unmet infrastructure need.

Mitigation is calculated as 15 percent of the unmet need calculation. Both unmet needs and mitigation grant amounts are rounded to the nearest \$1,000.

The unmet needs and mitigation are slightly greater than the amount to be allocated, so the amount allocated reflects the unmet needs and mitigation less a 1.2488 percent pro-rata reduction.

Grantee Level Allocations

As noted above, the basic formula for allocating these funds is to calculate for each disaster meeting a minimum “most impacted and distressed” damage threshold a formula that uses an estimate of unmet needs for housing, economic revitalization, and infrastructure plus 15 percent more for mitigation. Because in CY 2023 and CY 2024 some States and counties were impacted by multiple disasters, some States and counties are proposed to receive a single award for multiple disasters.

Where there are most impacted CDBG entitlement cities and/or CDBG entitlement urban counties, direct allocations were calculated to meet the dual goals of (i) funding locally and (ii) supporting efficient and effective program implementation.

Note that when an urban county is identified, the funds allocated are for the entirety of the county, not just participating jurisdiction in the regular CDBG program. The exception is when an entitlement city is also receiving a direct CDBG–DR award, in which case that is subtracted out of the county calculation.

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BILLING CODE 4210–67–P

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

[256A2100DD/AAKC001030/A0A501010.999900]

Mission Valley Power Project, Montana—Power Rate Adjustment

AGENCY: Bureau of Indian Affairs, Interior.

ACTION: Notice.

SUMMARY: The Bureau of Indian Affairs (BIA) has adjusted its electric power rates for the Mission Valley Power Project (MVP).

DATES: The 2025 rate adjustment will be effective March 1, 2025. The 2026 rate adjustment will be effective March 1, 2026.

FOR FURTHER INFORMATION CONTACT: For details about MVP, please contact Shane R. Hendrickson, Superintendent, Bureau of Indian Affairs, P.O. Box 40, Pablo, Montana 59855, (406) 675–2700, Ext 1301. Individuals in the United States who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services.

SUPPLEMENTARY INFORMATION: A Notice of Proposed Rate Adjustment was published in the **Federal Register** on November 14, 2024 (89 FR 90032) to propose adjustments to the electric power rates at MVP. The public and interested parties were provided an opportunity to submit written comments during the 30-day period that ended December 16, 2024.

Did BIA defer or change any proposed rate increases?

Yes. BIA will not implement the proposed 2024 rates due to procedural delays. The final 2025 and 2026 rates will be implemented as proposed.

Did BIA receive any comments on the proposed electric power rate adjustments?

No. BIA did not receive any comments on the proposed electric power rate adjustments.



Appendix J

Studies and Reports

Subject	Agency/Office
DR-4724-HI Housing Impact Assessment	HUD
Lahaina Wildfire Study: Impacts of Post-Disaster Housing Programs on Maui's Economy	FEMA

DR-4724-HI

Housing Impact Assessment



Housing Recovery Support Function

US Department of Housing and Urban
Development – Coordinating Agency

8/15/2024

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Executive Summary:

In August 2023, the County of Maui faced catastrophic wildfires, devastating Lahaina and impacting Kula. This disaster not only resulted in significant property damage and loss of life but also disrupted the socio-cultural fabric and economic stability of the region. This executive summary outlines the key findings, challenges, and considerations for the long-term housing recovery in the County of Maui, focusing on rebuilding Lahaina and addressing broader housing issues.

Key Findings:

1. **Scope of Damage:** The wildfires destroyed approximately 4,000 residential units, a majority of them renter occupied pre-disaster, with high numbers of overcrowded and multigenerational households among the displaced. This highlights a critical need for housing recovery, likely requiring more units than the units destroyed by the disaster.
2. **Historical and Cultural Impact:** Lahaina, once the capital of the Hawaiian Kingdom and now a national historic district and cultural hub, suffered immense loss, affecting its heritage and tourism economy.
3. **Housing Market Pre-Disaster:** Prior to the disaster, the County of Maui faced a housing shortage, with high real estate prices and a significant portion of housing stock allocated to short-term rentals (STRs).
4. **Demographics and Vulnerable Populations:** The impacted areas housed diverse communities, including significant populations of Native Hawaiians, foreign born, elderly, multi-generational families, and those with disabilities, necessitating tailored recovery approaches.

Challenges:

1. **Affordable Housing Shortage:** The existing deficit in affordable housing has been exacerbated by the wildfires.
2. **Infrastructure Inadequacies:** The disaster revealed weaknesses in housing-related infrastructure, including water, sewer, and electrical systems, as well as a need for upgraded system to serve higher-density multifamily developments in Transit-Oriented Communities (TOC), per the West Maui Community Plan.
3. **Economic Displacement:** The destruction of homes and tourism infrastructure has led to economic displacement, especially among low-income families and those employed in the tourism sector.
4. **Environmental Concerns:** Post-disaster environmental challenges, such as soil erosion and water contamination, pose additional risks. Anticipated impacts of sea-level rise and other climate changes may necessitate an update to building codes requiring relocation of coastal structures (both residential and commercial) and infrastructure.

Considerations:

1. **Increase Affordable, Resilient Housing:** Focus on building affordable, accessible, and disaster-resilient housing units, in well-connected, walkable TOC neighborhoods served by transit. Encourage the development of multifamily projects that have an increased number of larger units (3, 4 or 5 bedrooms) to accommodate multigenerational households.

2. **Strengthen Housing Infrastructure:** Enhance the resilience of housing-related infrastructure, focusing on renewable energy sources and efficient water and sewer systems in compact neighborhoods.
3. **Utilize ADUs and Missing Middle Housing:** Leverage Accessory Dwelling Units (ADUs) and Missing Middle housing (duplexes, townhouses, and small multifamily buildings) to increase affordable housing stock and provide incentives for homeowners to offer long-term rentals.
4. **Regulate STRs:** Implement policies to reduce the number of STRs, thus freeing up housing for long-term housing opportunities.
5. **Disaster Mitigation Measures:** Invest in infrastructure improvements and other mitigation measures to reduce future disaster risks, including the utilization of fire-resistant building materials and expanded roadways that provide greater access during an emergency. Adopt existing or approve new building codes that can improve building codes that can reduce property damage and protect lives.
6. **Support Workforce Housing:** Collaborate with employers to build and maintain affordable workforce housing served by transit, particularly for those in essential services like education and healthcare.

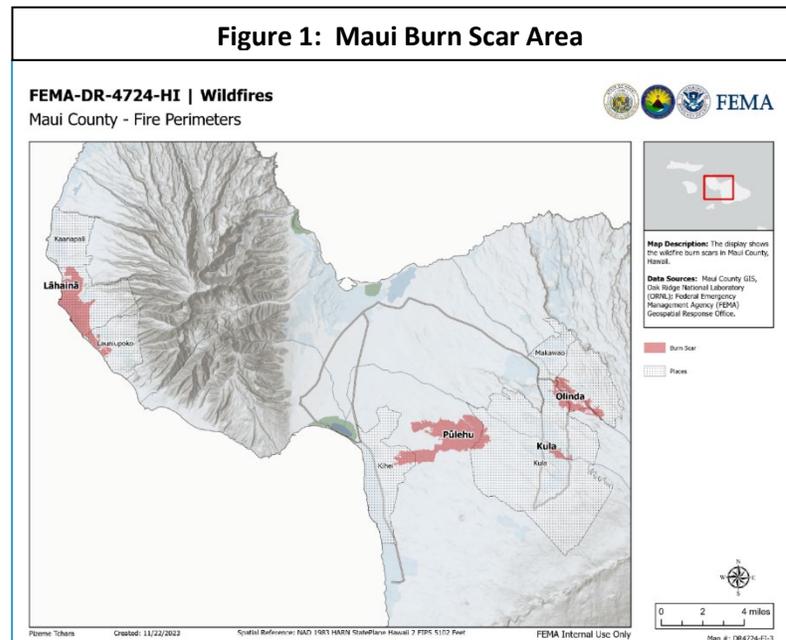
Overview

On August 07, 2023, strong winds were reported by the National Weather Service for the Hawaiian Islands. The County of Maui also issued a high wind warning. These conditions combined with the dry vegetation throughout Maui created the perfect wildfire conditions. On August 8, 2023, multiple brush fires broke out on Maui and the fire spread to the upcountry of Kula and Lahaina respectively. The wildfire in Kula spread throughout the upcountry area and destroyed 21 residential properties and 'Ohana units as well as burned 200 acres. The wildfire impacting the Town of Lahaina burned 2,170 acres and damaged or destroyed 1,595 residential structures in less than 20 minutes.

The Lahaina community was once home to the Hawaiian Royals. It was also formerly a whaling community that later became better known for its sugar plantations. Lahaina was designated as a national historic district in 1962 and served as a cultural showcase. It was one of the most popular tourist destinations in the State of Hawaii that pumped over \$6 billion annually into the state's \$19 billion tourist economy.

Lahaina, a community deeply rooted in history and home to Native Hawaiians, Chinese and Filipino communities, burned down in what seemed like an instant. Many of the plantation style homes that had been passed down through many generations were made of wood, built closely together, and were located on very narrow streets, which, when combined, contributed to the rapid spread of the wildfire. Much of the land surrounding the homes was the resting place of many of the local community ancestors, making the land sacred. When most of the Town of Lahaina burned to the ground, the residents lost not only their homes, but also a part of their culture, a way of life, and a source of income. These wildfires were not only the worst wildfires to ever happen in Hawaii, but they were also one of the worst catastrophic wildfires in US history and caused the loss of life for 102 of Lahaina's precious residents.

On August 10, 2023, two days after the start of the fires, Hawaii's Governor Josh Green requested that President Biden expedite the issuance of a Presidential Disaster Declaration (PDD) for the Hawaii Wildfire (DR-4724-HI). The County of Maui, which includes the island of Maui, Lanai, Molokai and Koho'olawe, are eligible to receive assistance from both FEMA's Individual Assistance (IA) and Public Assistance (PA) programs while the island of Hawaii (Big Island) is only eligible for Public Assistance



Sources: US Census, Hawaii GIS Program, Maui County GIS, and Honolulu GIS Office

This document contains an overview of the pre-disaster housing conditions, post-disaster housing impacts, as well as key considerations and resources to assist the County of Maui in planning its long-term housing recovery. During the data collection process, the Housing Recovery Support Function (RSF) engaged, as appropriate, other RSFs (Community Assistance, Health and Social Services, Infrastructure, Economic and Natural and Cultural Resources) to facilitate identification of cross-sector housing-related issues, including but not limited to mitigation efforts, repair of critical infrastructure, as well as economic recovery. Continued coordination by the County of Maui with its State and Federal partners will ensure programs and services are delivered. This will efficiently help to address both pre-and post-disaster housing recovery needs and gaps, especially those in rural and unique communities in Maui, where the need for quality affordable housing has been exacerbated by the wildfire.

The County of Maui developed and adopted seven guiding principles for recovery. These principles have been integrated into the Recovery Needs Assessment and the Housing Impact Assessment. The guiding principles are outlined below in Figure 2.

Figure 2: Seven Guiding Principles for Recovery



Through pre- and post-disaster housing data analysis and limited stakeholder engagement, the Housing RSF identified six key areas for consideration by the County of Maui and its partners for inclusion in their long-term recovery planning:

- Increase the Number of Affordable, Accessible and Resilient Rental Units
- Strengthen Housing-Related Infrastructure for Resilient Communities
- Utilize Accessory Dwelling Units (ADUs) and Middle Missing Housing to Increase the Number of Affordable Housing Units
- Identify ways to reduce the usage of Short-Term Rentals (STRs)
- Identify ways to mitigate potential loss from future disasters.
- Provide incentives for employers to build or to subsidize workforce housing.

Housing Recovery Support Function

The National Disaster Recovery Framework (NDRF) helps ensure that all communities can coordinate recovery efforts to address their unique needs, capabilities, demographics, and governing structures. It encourages an inclusive recovery process, engaging traditional and nontraditional whole community partners, and provides a strategic and national approach to lead, manage, and coordinate recovery efforts while increasing the resilience of our communities.⁵

The NDRF establishes a common platform and forum for how the whole community builds, sustains, and coordinates the delivery of recovery capabilities. Resilient and sustainable recovery encompasses more than the restoration of a community's physical structures to pre-disaster conditions. Through effective coordination of partners and resources, we must ensure the continuity of services and support to meet the needs of affected community members who have experienced the hardships of financial, emotional, and/or physical impacts of devastating disasters.¹

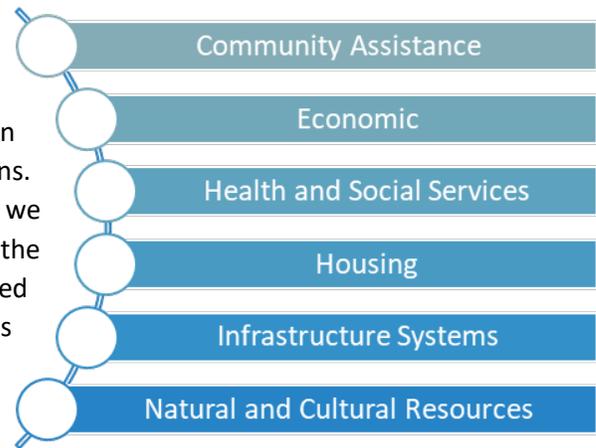
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Each RSF has a designated coordinating agency along with primary agencies and supporting organizations with programs relevant to the functional area. The RSF Coordinating Agency, with the assistance of the Federal Emergency Management Agency, provides leadership, coordination, and oversight for that recovery area of focus.

Under the NDRF, the US Department of Housing and Urban Development (HUD) is the coordinating agency for the Housing RSF. The mission of the Housing RSF is to:

- Support efforts to address pre- and post-disaster housing issues.
- Facilitate the delivery of federal resources to implement housing solutions that effectively support the needs of the whole community and contribute to its sustainability and resilience.
- Support activities to assist local, state, and tribal governments in the rehabilitation and reconstruction of damaged and destroyed housing.
- Support efforts to develop new accessible, permanent housing options.

Figure 3: The Six NDRF Recovery Support Functions



⁴ National disaster recovery framework - fema.gov 2nd Edition June 2016. (n.d.).

https://www.fema.gov/sites/default/files/2020-06/national_disaster_recovery_framework_2nd.pdf

The Housing RSF collaborates with all other RSFs mission assigned to a specific Presidentially Declared Disaster, in addition to federal, state, tribal and nongovernmental agencies, to identify pre- and post-disaster housing challenges, assist in the development of long-term housing recovery options for displaced households and provide requested programmatic and technical assistance. Additionally, housing recovery efforts shall seek to advance equity and will include support for underserved and marginalized communities.

Coordinating Agency: US Department of Housing and Urban Development (HUD)

Primary Agencies: Federal Emergency Management Agency (FEMA)
US Department of Agriculture, Rural Development (USDA RD)
US Department of Justice (DOJ)

Supporting Agencies: American Red Cross (ARC)
Corporation for National and Community Service (CNCS)
US Department of Commerce (DOC)
US Department of Energy (DOE)
US Department of Health and Human Services (HHS)
US Department of Veterans Affairs (VA)
US Environmental Protection Agency (EPA)
US General Services Administration (GSA)
US Small Business Administration (SBA)
US Access Board
National Voluntary Organizations Active in Disaster (NVOAD)

State Agencies: Hawaii Housing Finance & Development Corporation
State of Hawaii Office of the Governor’s Recovery and Resiliency
State of Hawaii Office of the Governor’s Office of Housing
Department of Human Services
Hawaii Statewide Office on Homelessness and Housing Solutions
Hawaii Public Housing Authority
Department of Hawaiian Home Lands

The County of Maui Agencies: Department of Housing & Human Concerns
Department of Public Works
Department of Planning

Private Agencies: Council for Native Hawaiian Advancement (CNHA)
Hawaii Community Foundation

Housing Impact Assessment

Purpose

The primary purpose of the Housing Impact Assessment (the “Assessment”) is to be a resource document for state and county officials, as they consider, develop, and execute their recovery plans. The Housing RSF, in collaboration with FEMA, USDA RD and the State collected, analyzed, and synthesized damage assessment data and housing impacts resulting from the Hawaii Wildfires (DR-4724-HI). This document contains impact data and other housing information that should assist the State and County when making critical decisions related to effective recovery planning and coordination.

Data Analysis

The Housing RSF team, with support from HUD’s Office of Policy Development and Research (PD&R), reviewed and analyzed data from the following sources:

- FEMA Individual Assistance (IA) Open Disaster Statistics as of January 10, 2024
- FEMA Individual Assistance (IA) inspection and structure type data as of March 12, 2024
- FEMA Individual Assistance (IA) inspection and registrant data as of March 12, 2024
- Baseline Census data for the impacted areas, including 2022 American Community Survey (ACS) 5-Year Estimates
- USDA RD Single-Family and Multifamily Housing portfolio
- Small Business Administration (SBA) DR-4724 FEMA Disaster Loan data
- HUD Assisted Housing Portfolio (PIH, Single Family, Multifamily, Assisted Living Facility) pre- and post-housing data.
- United States Postal Service (USPS) data on counts of addresses receiving mail pre- and post-disaster as of March 30, 2024

The Housing RSF also reviewed:

- Summaries of housing plans, need assessments, and other relevant documents, and transcripts of public testimony given during town halls.
- Examples of disaster recovery efforts that were pursued by other states and local governments facing similar disaster recovery issues.
- The Hawaii State Housing Plan (February 2017), West Maui Community Plan and Housing Technical Resource, (October 2018), West Maui Plan (January 2022), Hawaii Housing Planning Study & Inventory Report (2019), Need for Housing Among Individuals with Access and Functional Needs in Hawaii 2019-2020, and Measuring Housing Demand in Hawaii 2015-2025.

Additionally, the Housing RSF would recommend review and potential inclusion of information contained in the West Maui Community Corridor Framework for a Resilient Future during the recovery planning process.

The assessment does not provide recommendations for specific housing recovery strategies that State and County officials should pursue. Instead, as noted above, this document should be a resource as they consider options for recovery. Jurisdictions may find this document helpful for informing their required housing needs assessment for current recovery and future planning needs.

Stakeholder Outreach

The Housing RSF has conducted limited stakeholder engagement due to the catastrophic nature of this event. Initially, the State of Hawaii and the County of Maui have primarily focused their efforts on the very difficult task of identifying temporary and permanent housing solutions for wildfire survivors. However, the Mayor has and continues to host weekly public meetings in Lahaina to provide disaster response and recovery updates and to obtain to survivor feedback regarding recovery planning which included preferred housing options.

In recent months, the County of Maui's Planning Department has commenced neighborhood meetings with the various stakeholders. The neighborhood meetings are an opportunity for the residents, businesses and other stakeholders to discuss housing, infrastructure, safety, and economic challenges and potential solutions.

The Housing RSF reviewed various meeting summaries and testimonies from the impacted communities and its residents, along with input from the local leaders, housing providers, and other stakeholders. The Housing RSF also employed the following strategies:

- Working with other state and federal RSFs to identify cross-cutting concerns and issues that directly impact providing long-term housing solutions for impacted residents.
- Worked closely with the State Joint Housing Task Force (JHTF),
 - The County of Maui Department of Public Works, the County of Maui Department of Housing and Human Concerns, FEMA, HUD, USDA RD, SBA, Hawaii Governor Office of Homelessness, Hawaii Governor Office on Housing Solutions, Hawaii Housing and Finance Development Corporation (HHFDC), Hawaii Department of Education (DOE), Hawaii Public Housing Authority (HPHA), Hawaii Emergency Management Agency (HIEMA), Hawaii Department of Human Services (DHS), Hawaii Department of Hawaiian Home Lands (DHHL), Hawaii Community Foundation (HCF), American Red Cross (ARC), and the Tidal Basin Rising Phoenix Holding Corporation.
- The Permanent Housing Solutions Subcommittee was formed to identify long term housing solutions and address barriers for projects under construction or in the construction pipeline, including identifying funding sources that could be leveraged with other funds. The following entities are part of the Permanent Housing Subcommittee led by the County of Maui Housing RSF:
 - The County of Maui Department of Public Works, the County of Maui Department of Housing and Human Concerns, HUD, USDA RD, SBA, Hawaii Governor Office of Homelessness, Hawaii Governor Office on Housing Solutions, Hawaii Housing and Finance Development Corporation (HHFDC), Hawaii Department of Education, Hawaii Public Housing Authority, Hawaii Department of Hawaiian Home Lands (DHHL), Hawaii Emergency Management Agency, Hawaii Department of Human Services, Hawaii Community Foundation

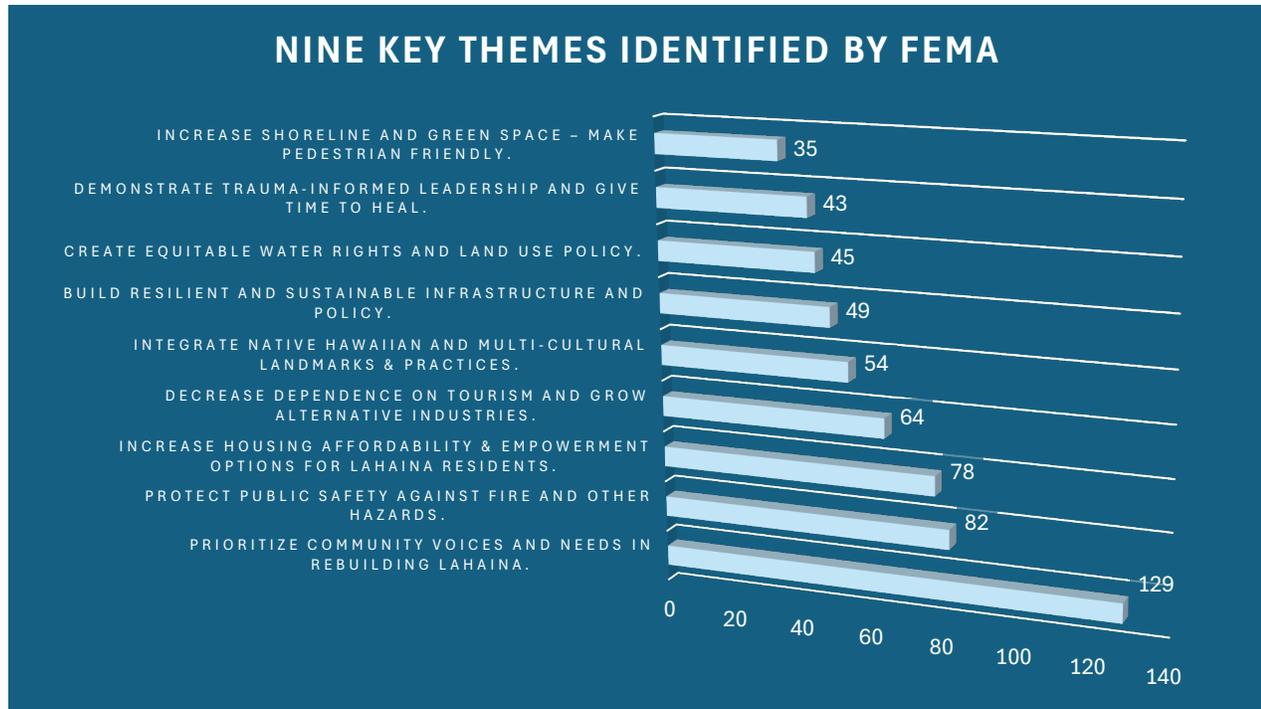
The Maui County Council has two committees responsible for oversight of various County subject matter topics. The committee breakdown is as follows:

- Government Relations, Ethics, and Transparency Committee – which has oversight of the Office of the Mayor, Mayoral and Council appointments and removal, Litigation matters, Amendments to the County of Maui Charter and Intergovernmental Issues

- Disaster, Resilience, International Affairs, and Planning Committee – which has oversight of the Maui Emergency Management Agency, the Department of Fire and Public Safety, the Department of Police, and the Community Plan Advisory Committee

The Council provided a public forum for survivors to give their testimony. They conducted nine public meetings from September 27, 2023, through November 2, 2023. A total of 165 survivors testified totaling over 30 hours of testimony. FEMA staff analyzed the transcripts and identified nine key themes by counting the number of times a specific topic was mentioned. This process yielded the following results:

Figure 4: FEMA Nine Identified Key Themes



Additionally, The County is aware of the need to revitalize its cultural and social fabric through the recovery process to build long-term resilience. A locally focused perspective supports this aspect of resilience, and the Mayor of the County of Maui established an advisory group to provide input on recovery planning efforts, specifically those in Lahaina. This advisory group, the Lahaina Advisory Team, is comprised of a group of five Lahaina residents, three of which lost their homes in the fire and four of them graduated from the local high school.²

² Mayor Richard Bissen announces creation of Lahaina Advisory Team, community informational meeting. Maui County. (n.d.). <https://www.mauicounty.gov/CivicAlerts.aspx?AID=12870>

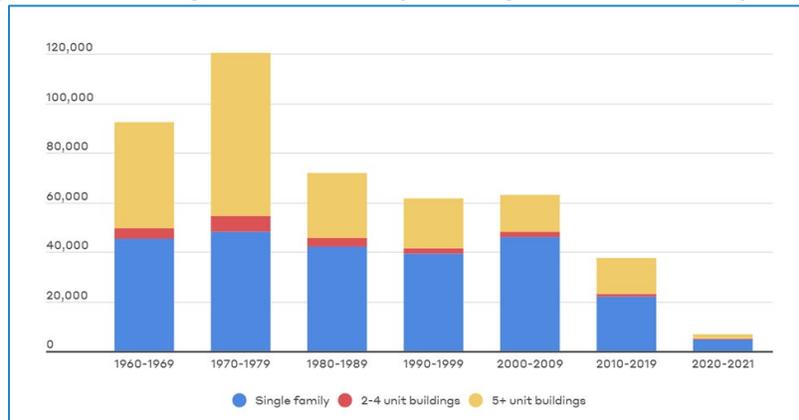
Pre-Disaster Housing Conditions

Housing Overview

As indicated in the Bipartisan Policy Center’s Housing Study Trends in all 50 States Report, dated December 6, 2022, Hawaii experienced a steady population growth during 2010 to 2020³. There was an average yearly population increase of 4,300 during each of these years. During the same timeframe, the housing stock only increased by approximately 3,400 units per year resulting in a shortage. This pre-disaster housing shortage has been further exacerbated by the number of damaged and destroyed housing units due to the wildfire.

The Bipartisan Policy Center’s report also indicates, as seen in Figure 5, housing units (single family and multi-family) that were permitted over the past four decades show a gradual reduction in buildings with 5 or more units. Whereas single-family homes have decreased more than 50% from 45,890 during 2000-2009 to 22,119 in 2010-2019.⁴ Multi-family permitting has been stabilizing over the past three decades 1990-1999 (20,087), 2000-2009 (14,910), 2010-2019 (14,823). One potential reason for this reduction in single-family development could be attributed to the fact that only 4% of the entire State of Hawaii is zoned for residential development. This small percentage of available land for development reduces the production potential for units, especially those available for the local workforce, including agricultural workers and low-income families.⁵ Other factors such as the housing market, builder/buyer trends, and land use/zoning items, are often larger influences on the types of housing being built.

Figure 5: Total Single & Multi-Family Housing Units Permitted by Decade



Sources: US Census (American Community Survey and Building Permit Survey), Rosen Consulting Group, Haver Analytics

Hawaii has 557,000 housing units of which 5.5% (30,000) operate as a Short-Term Rental (STR). According to UHERO Factbook, Out-of-state buyers account for about half of all condominium sales in Maui and Hawaii counties.⁶ Maui and Kauai County STR market represent 15% of the total housing market on Maui and Kauai.

³ *Housing Supply Trends in all 50 States Report*, Bipartisan Policy Center, December 6, 2022, <https://bipartisanpolicy.org/report/housing-supply-trends-50-states/>

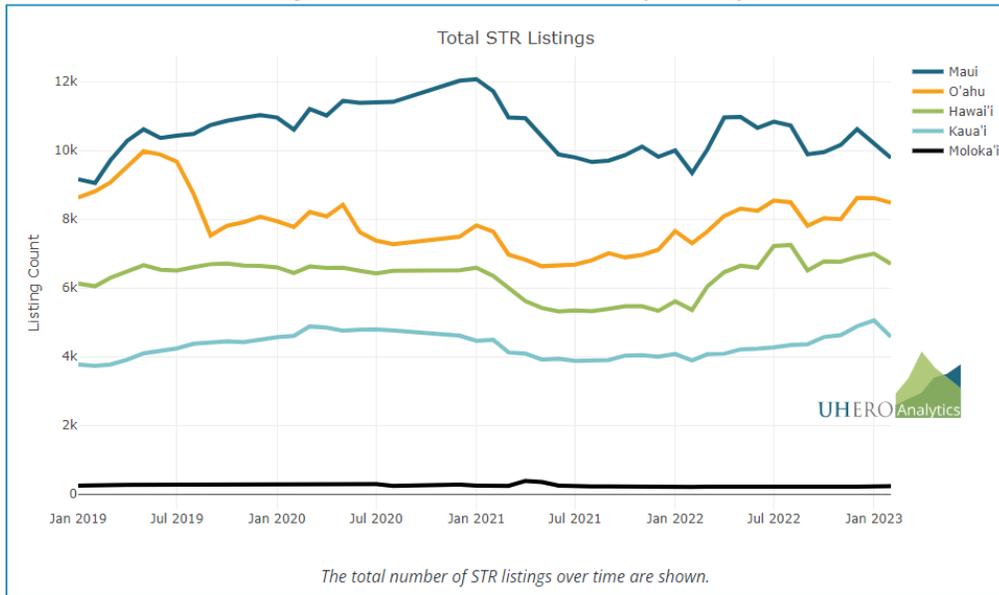
⁴ *Housing Supply Trends in all 50 States Report*. Bipartisan Policy Center, December 6, 2022, <https://bipartisanpolicy.org/report/housing-supply-trends-50-states/>

⁵ Bond-Smith, D., Tyndall, J., & Inafuku, R. (2023, June 28). *The Hawai'i Housing Factbook*. UHERO. <https://uhero.hawaii.edu/the-hawaii-housing-factbook/>

⁶ The Hawai'i Housing Factbook. (2023, June 28). <https://uhero.hawaii.edu/the-hawaii-housing-factbook/>

The three largest areas with a high percentage of STRs are Princeville (Kauai), Lahaina (Maui) and Waikiki/Kapahulu (Honolulu) which account for 71%, 40% and 22% respectively of the total housing supply in these cities. For Lahaina zip code 96761 there are 11,730 housing units of which 4,694 are active STRs. In Figure 5 below, the County of Maui has the most STRs in the State of Hawaii averaging more than 10,000 units over the past 5 years.

Figure 6: Short-term Rentals by County



Source: UHERO Analytics (Hawaii Housing Dashboard)

According to the Hawaii Housing Factbook provided by the University of Hawaii Economic Research Organization (UHERO), there were approximately 71,318 housing units in the County of Maui as of June 28, 2023. Of these units, an estimated 25,681 were for renters and 45,637 were owners.⁷

Looking at zip codes in the County of Maui that have the most housing units in relation to Cost Burdened Households, the American Community Survey (ACS) 2021 5-year data shows that the three zip codes with the highest number of housing unit increases proportionately with the cost burdened households.

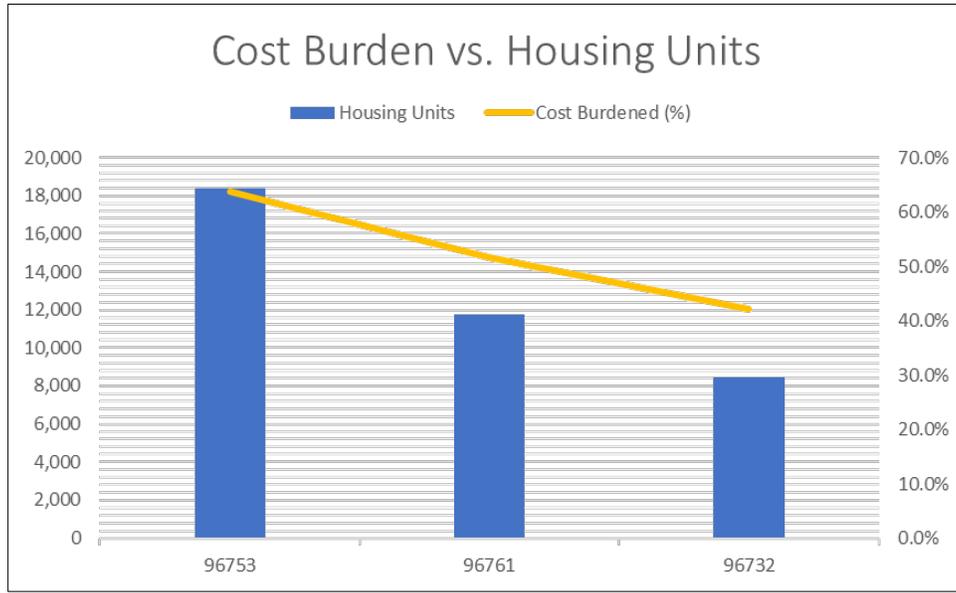
Cost Burdened: Those spending more than 30% of their income on housing costs and utilities.

Severely Cost Burdened: Those spending more than 50% of their income on housing costs and utilities.

- 63.8% of Households in zip code 96753 (Kihei & Wailea) are Severely Cost Burdened
- 51.7% of Households in zip code 96761 (Lahaina) are Severely Cost Burdened
- 42.2% of Households in zip code 96732 (Kahului) are Cost Burdened

⁷ The Hawai'i Housing Factbook. (2023, June 28). <https://uhero.hawaii.edu/the-hawaii-housing-factbook/>

Figure 7: The County of Maui’s Cost Burden vs. Housing Unit



Source: American Community Survey 2021 5-year data

Housing Stock in Impacted Areas

Pre-Disaster Housing Characteristics

The County of Maui contains approximately 12.8% of Hawaii’s housing stock, and accounts for about 13.5% of the state’s 1-unit detached or attached (single-family) housing units. The County of Maui had 13.9% of Hawaii’s 5-to-19-unit structures and approximately 9.1% of the units in structures with 20 or more units of the State of Hawaii housing inventory.

Table 1: Pre-Disaster Housing Stock

Location	Total Housing Units	1, detached or attached unit	2 to 4 units	5 to 19 units	20 or more	Mobile home, boat, RV, van, etc.
Hawaii	568,058	359,188	34,283	60,193	111,531	2,863
Maui County	72,941	48,490	5,570	8,356	10,199	326
% of Total in Affected County	12.8%	13.5%	16.2%	13.9%	9.1%	11.4%

Source: American Community Survey, DP04 Selected Housing Characteristics 2021 5-year data

All zip codes have less than 5% of the available properties available for purchase. Of the occupied properties, 61% and 39% are owner occupied and renter occupied respectively. In the zip codes represented, only five zip codes have over 50% cost burden for occupants, of which one zip code 96761 is Lahaina at 51.7%.

Table 2: Characteristics State & Zip

Characteristic	Hawaii	96708	96713	96729	96732	96742	96748	96753	96757	96761	96763
Housing Units	556,937	4,552	619	433	8,466	87	2,139	18,355	308	11,730	1,563
Vacant (%) [4]	14.1%	11.8%	40.1%	10.4%	6.6%	64.4%	35.0%	40.9%	21.8%	38.0%	24.3%
For Sale (%)	1.20%	0.60%	4.10%	0.00%	0.20%	-	2.60%	1.60%	0.00%	2.70%	2.40%
For Rent (%)	8.3%	4.3%	32.0%	0.0%	7.2%	6.1%	21.5%	49.9%	19.6%	30.5%	2.3%
Owner Occupied (%)	61.0%	59.8%	44.5%	79.9%	64.2%	0.0%	60.9%	61.3%	83.0%	56.0%	55.5%
Renter Occupied (%)	39.0%	40.2%	55.5%	20.1%	35.8%	100.0%	39.1%	38.7%	17.0%	44.0%	44.5%
Gross Rent Under \$500 (%)	5.6%	0.8%	0.0%	12.0%	13.8%	0.0%	32.4%	2.9%	0.0%	3.5%	4.5%
Gross Rent Between \$500 and \$1000 (%)	10.7%	5.9%	12.2%	28.0%	14.0%	25.0%	22.9%	6.9%	12.1%	8.0%	43.8%
Gross Rent Above \$1000 (%)	83.7%	93.3%	87.8%	60.0%	72.2%	75.0%	44.7%	90.2%	87.9%	88.5%	51.7%
Cost Burdened (%) [5]	55.3%	47.1%	61.8%	64.0%	42.2%	8.3%	79.7%	63.8%	48.5%	51.7%	15.9%
Housing Built Pre-1950 (%)	6.7%	11.5%	10.8%	10.9%	3.3%	52.9%	5.2%	0.8%	38.0%	0.9%	32.7%
Median Year Built	1979	1988	1991	1980	1978	1947	1978	1986	1960	1980	1978
Manufactured Homes (Mobile housing) (%)	0.2%	0.0%	0.0%	2.8%	0.9%	2.3%	0.0%	0.2%	0.0%	0.4%	0.0%

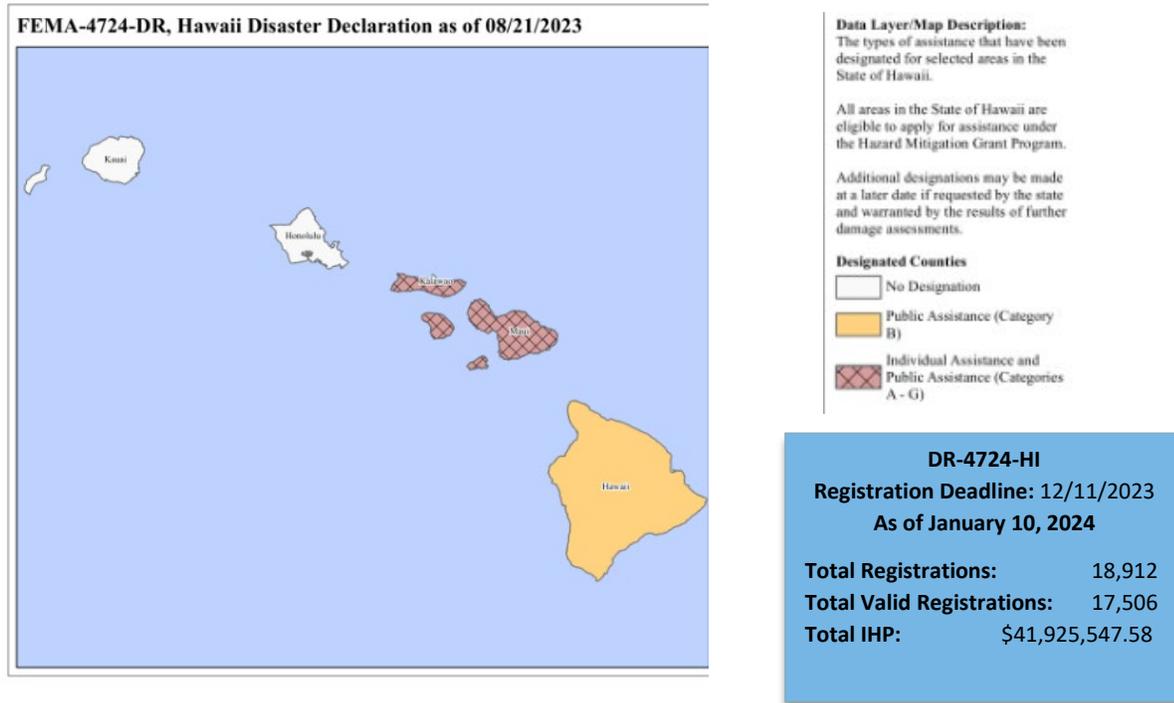
Source: 2021 5-year ACS

Post-Disaster Impacts

FEMA Registration Information

As shown in Figure 9, only the County of Maui has been designated by FEMA for Public Assistance and Individual Assistance. Hawaii County has been designated for FEMA Public Assistance only.

Figure 8: FEMA IA and PA Designated Counties



US Small Business Administration (SBA) Disaster Loan Information

The SBA provides low-interest, long-term disaster loans to homeowners, and renters to repair or replace uninsured/underinsured disaster damaged property. For home loans, SBA regulations limit home loans to \$200,000 for the repair or replacement of real estate and \$40,000 to repair or replace personal property. Subject to these maximums, loan amounts cannot exceed the verified uninsured disaster loss. Interest rates for the term of the loan are determined by formulas set by law and vary from disaster to disaster. Interest rates will not exceed 4% and the maximum term is 30 years. SBA sets installments and maturity based on each borrower's ability to repay. Additional SBA disaster loan information can be found here: <https://www.sba.gov/funding-programs/disaster-assistance>.

As of February 29, 2024, SBA has approved more than **\$292 million** in federal disaster loans for Hawaii businesses, nonprofits and residents impacted by the wildfires (DR-4724-HI). This figure includes more than **\$191 million** in home loans to help residents rebuild and recover from the disaster.

As part of the loan process, SBA conducts a credit review for all applicants. As indicated in Table 3, there was a high percentage of the total number of applicants that did not meet the minimum income requirements for loan approval, otherwise known as the Failed Income Test (FIT). In the last column of Table 3, the percentage of FIT to Total in the impacted zip codes ranges from 100% to 43.8%. Zip code 96761 has the lowest percentage of households that failed at 43.8% and seventeen zip codes were at 100%. Please note that households denied SBA loans due to their FIT, are typically those with the fewest financial resources and the greatest financial need. As a result of the high percentage of FIT determinations, there may be recovery resource gaps for many of the impacted households.

Table 3: Small Business Administration

Zip Code	SBA Under Review	SBA Cancelled or Withdrawn	SBA Loan Approved	SBA Ineligible Not Referred to ONA	SBA Ineligible Referred to ONA	SBA FIT	SBA Total	Percentage of FIT to Total
96706	0	0	0	0	0	1	1	100.00%
96708	0	0	0	1	2	60	63	95.2%
96713	0	0	0	0	1	7	8	87.5%
96729	0	0	0	0	0	1	1	100.0%
96732	0	4	0	0	9	245	258	95.0%
96734	0	0	0	0	0	1	1	100.0%
96743	0	0	0	0	0	1	1	100.0%
96748	0	0	0	0	0	11	11	100.0%
96749	0	0	0	0	0	1	1	100.0%
96753	1	13	0	1	9	201	225	89.3%
96757	0	0	0	0	0	1	1	100.0%
96758	0	0	0	0	0	1	1	100.0%
96761	17	798	797	132	1,500	2,524	5,768	43.8%
96763	1	1	2	0	0	6	10	60.0%
96768	0	11	1	0	11	128	151	84.8%
96770	0	0	0	0	0	2	2	100.0%
96779	0	1	0	0	0	14	15	93.3%
96782	0	0	0	0	0	1	1	100.0%
96790	2	25	21	8	34	185	275	67.3%
96792	0	0	0	0	0	1	1	100.0%
96793	0	3	1	3	8	289	304	95.1%
96797	0	0	0	0	0	1	1	100.0%
96815	0	0	0	0	0	1	1	100.0%
96818	0	0	0	0	0	1	1	100.0%
96819	0	0	0	0	0	1	1	100.0%

Source: FEMA FIDA Report 21196, March 12, 2024

Insurance and Loan Access

As shown in Table 4, a total of 46.6% of FEMA registered homeowners referred for assistance reported during the time of FEMA registration that they had homeowners’ insurance coverage. The percentage of homeowner registrants who reported that they did not have homeowners’ insurance was 53.4%. The percentage of renters who reported having renters’ insurance coverage was 0.7%.

If only 19.6% of the total number of FEMA registrants (17,508) have homeowners or renter’s insurance, recovery efforts for a sizable portion of the impacted households may have serious financial gaps. The very low percentage of those with some type of insurance coverage may also indicate recovery gaps and additional resource needs for a significant portion of those impacted.

Table 4: Home Insurance by Tenure

	Total	With Homeowners Insurance	% of Total	Without Homeowners Insurance	% of Total
Owners	7,188	3,350	46.6%	3,838	53.4%
Renters	10,247	74	0.7%	10,173	99.3%
No Tenure	73	7	9.6%	66	90.4%
Totals	17,508	3,431	19.6%	14,077	80.4%

Source: FEMA FIDA Report 34761, March 12, 2024

Demographic Information

The Housing RSF received and analyzed various data for the County of Maui. However, the wildfires had the greatest impact in zip code 96761. Therefore, this Assessment provides a deep dive into the Census Tracts of zip code 96761 as well as provides analysis on the whole County, excluding Kalaupapa, Molokai and Lanai.

A deep dive into the Census Tracts of Zip Code 96761

The wildfires had the greatest impact in zip code 96761. This section takes an in-depth look at the eight Census Tracts that comprise zip code 96761.

Exhibit 1. Census Tracts comprising Zip Code 96761



FEMA registrant data on homes destroyed is an incomplete expression of households impacted by the disaster. The registration data are useful as a measure of households needing assistance with recovery, but they are not a perfect reflection of the total number of units destroyed. The FEMA registrant data do not count homeowners with adequate insurance coverage; they do not count the short term rental units that were destroyed; they likely overcount the number of renters because there can be multiple registrants from a single unit (for example, the adult child living with their parents; multi-generation households; and two unrelated individuals sharing a unit all reflect occupants of a single housing unit, but often appear in the FEMA data as separate registrants).

Table 5 shows the following:

- Within zip code 96761, the damage was concentrated in just three Census Tracts: 031404, 031402, and 031405.
- There are many more registrants than there are unique addresses among the registrants, particularly for renters. The count of registrants from a destroyed unit is 4,023, but the unique addresses⁸ damaged with one or more registrant is just 1,965.

⁸ HUD made this determination by geocoding addresses using USPS software that codes each individual address with a unique 11-digit code. This method generally leads to an undercount of actual addresses because some addresses for apartments only give the building address, and thus multiple apartments may be counted as a single unit. Other communities might have a shared address even though units are separate. This generally, should be considered a “floor”, while the total registrant count a “ceiling” on the range of units occupied by a FEMA registrant with a FEMA inspection.

- The mismatch between the two numbers mostly reflects renters, but many of the “renter” households likely had been in a home that was owner occupied.

Table 5. FEMA Registrants – in homes destroyed by the wildfire

<u>Census Tracts of Zip Code 96761</u>									
	<u>031404</u>	<u>031402</u>	<u>031405</u>	<u>032000</u>	<u>031503</u>	<u>031505</u>	<u>031504</u>	<u>031501</u>	<u>Total</u>
FEMA Registrants - destroyed									
Owner	153	111	153	1	0	0	0	0	418
Renter	<u>1,422</u>	<u>1,015</u>	<u>1,142</u>	<u>0</u>	<u>25</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>3,605</u>
<i>Total</i>	<i>1,575</i>	<i>1,126</i>	<i>1,295</i>	<i>1</i>	<i>25</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>4,023</i>
Unique addresses with one or more FEMA Registrant									
Owner	132	107	135	1	0	0	0	0	375
Renter	<u>703</u>	<u>411</u>	<u>472</u>	<u>0</u>	<u>3</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>1,590</u>
<i>Total</i>	<i>835</i>	<i>518</i>	<i>607</i>	<i>1</i>	<i>3</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>1,965</i>

As noted above, registrant data can both overcount and undercount damage. Another method to estimate the number of units destroyed by tenure and vacancy status pre-disaster is to take advantage of the concentrated nature of the wildfire in just three of the eight Census Tracts of zip code 96761: 031404, 031402, and 031405.

We can estimate the likely number of owner units, renter units, and vacant units destroyed with two alternative sources of data from the FEMA registrant data. Those alternative data sources are the 2020 Decennial Census, which is a 100 percent count of housing units – owned, rented, and vacant – and United States Postal Service data on addresses taking mail before and after the disaster. The USPS data is a way to proxy the percentage of homes destroyed – the percent reduction in homes taking mail. This multiplied times the Decennial Census data on owner, renter, and vacant units⁹ to get a rough estimate of the number of owner, renter, and vacant units destroyed.

As Table 6 shows, this method estimates 3,635 destroyed housing units, 1,482 owner-occupied, 1,585 renter-occupied, and 568 vacant pre-disaster.

Table 6. Estimating housing units destroyed by tenure and occupancy using USPS and Decennial Census Data

⁹ This assumed that the Census 2020 distribution of owner, renter, and vacant homes in each Census Tract were destroyed at the same rate. The higher the rate of destruction, the greater the confidence in this assumption.

Census Tracts of Zip Code 96761

<u>2020 Decennial Census</u>	<u>031404</u>	<u>031402</u>	<u>031405</u>	<u>032000</u>	<u>031503</u>	<u>031505</u>	<u>031504</u>	<u>031501</u>	<u>Total</u>
Total Housing Units	1,702	983	1,509	1,001	3,111	2,202	664	1,799	12,971
Occupied Housing Units	1,257	883	1,451	471	1,111	1,520	482	772	7,947
Owner occupied	445	519	811	316	487	781	298	520	4,177
Renter occupied	812	364	640	155	624	739	184	252	3,770
Vacant Housing Units	445	100	58	530	2,000	682	182	1,027	5,024
USPS Data on Active Addresses									
Pre-Disaster	1,415	938	1,087	832	1,862	1,297	524	999	8,954
Post-Disaster	17	151	395	834	1,869	1,298	525	1,003	6,092
Change in Active Addresses	-1,398	-787	-692	2	7	1	1	4	-2,862
<u>Estimated % destroyed (pct reduction in active addresses from USPS)</u>									
<u>% destroyed</u>	99%	84%	64%	0%	0%	0%	0%	0%	28%
<u>Likely destroyed (Estimated % destroyed x 2020 Decennial Census)</u>									
Owner	440	447	595	0	0	0	0	0	1,482
Renter	802	314	469	0	0	0	0	0	1,585
Vacant	440	86	43	0	0	0	0	0	568
Total Estimated Units Destroyed	1,682	847	1,107	0	0	0	0	0	3,635
Total Estimated Occupied Units Destroyed	1,242	761	1,064	0	0	0	0	0	3,067

Table 7 pulls the data together from Tables 5 and 6. While it is likely that nearly 1,500 owner occupied units were destroyed, fewer than one-third of those owners are registered with FEMA as likely to qualify for FEMA assistance. For those not registered with damage, that does not mean that insurance will be adequate for full recovery. The high cost of construction in Maui likely means insurance will be inadequate for full recovery for many.

The number of rental units destroyed is estimated at roughly 1,600, but because of overcrowding, multi-generational housing, and the very high cost to rent in Maui, the true need for affordable rental housing is more than 3,000 units.

Table 7 Comparing alternative measures of destroyed housing units

Zip Code 96761 (8 Tracts combined)

	FEMA Registrant damaged or destroyed from Table 5		USPS/Census Destroyed from Table 6
	All	Unique address	Estimate
Owner	418	375	1,482
Renter	3,605	1,590	1,585
Vacant	NA	NA	568
Total Occupied	4,023	1,965	3,067
Total	NA	NA	3,635

The three hardest hit Census Tracts: 031404, 031402, 031405, likely experienced a loss of housing of 99%, 84%, and 64% respectively. The remaining tables provide details on the households living in these three Census Tracts combined.

Exhibit 2. Most Impacted Census Tracts



Pre-Disaster Household Demographics, Census Tracts 031402, 031404, 031405

According to 2021 ACS data, Table 8 shows that the households in the impacted Census Tracts were large, averaging 3.71 persons per household, 44 percent of the households had children (3,141 children lived in the Census Tracts) and 40 percent had elderly members. Quite unusual and notable are the high number of other relatives (2,641) and other nonrelatives (1,541) living in these households. As discussed above, within the FEMA registrant data, these other relatives and nonrelatives are often treated as separate from the main household leading to the higher count of FEMA renter registrants than actual number of rental units destroyed.

Table 8. Household characteristics in Census Tracts 031402, 031404, 031405

Total households	3,480		
Households with one or more persons under 18 years	1,528	44%	
Households with one or more persons 65 years and over	1,400	40%	
Average household size	3.71		
Population in households	12,918		
Householder	3,480	8,736	68%
Spouse or unmarried partner	2,115		
Child	3,141		
Other relatives	2,641	4,182	32%
Other nonrelatives	1,541		

Source: 2021 5-Year ACS

Table 9 indicates that educational levels are modest, disability rates are low. It also shows that this was both home to many natives of Hawaii and many people from other countries: 43% of residents had been born in Hawaii. On the other hand, 32% of residents had been born outside the US and 36% speak a language other than English at home.

Table 9. Individual Characteristics in Census Tracts 031402, 031404, 031405

Pct. Pop. 25 years and over with a Bachelor’s Degree or higher	24%
Pct. Pop. 18 years and over a veteran	5%
Pct. Pop. With a Disability	8%
Pct. Pop. Over 65 with a Disability	28%
Percent move into house in prior year	12%
Percent move from other county in Hawaii	2%
Percent move from another state	3%
Percent born in Hawaii	43%
Percent born outside US	32%
Percent over age 5 speak language other than English at Home	36%

Percent speak English "less than well"	17%
Percent speak Asian and Pacific Islander language	28%

Source: 2021 5-Year ACS

Pre-Disaster Housing Type, Census Tracts 031402, 031404, 031405

Table 10 shows that the impacted Census Tracts had 4,110 housing units that were predominantly year-round residents, with just 15 percent of the units vacant. The neighborhoods had a significant diversity of housing types, 27% of units were in buildings of 5 or more units. Nearly all of the housing was more than 10 years old.

Table 10. Total Housing Units Select Characteristics in Census Tracts 031402, 031404, 031405

Total Housing Units	4,110
Occupied	85%
Vacant	15%
1-unit, detached	40%
1-unit, attached	14%
2 units	6%
3 or 4 units	13%
5 to 9 units	10%
10 to 19 units	10%
20 or more units	7%
Built 2010 to 2021	7%

Source: 2021 5-Year ACS

Table 11 shows that among the occupied units, there was about a 50/50 split between those that were owner occupied and renter occupied. The rate of overcrowding was very high, 18% of units had more than 1.01 persons per room.

Owner occupied units had a very high median value of over \$729,000 in 2021. Given the acceleration in values in 2022, this is likely an understatement of the value at the time of the disaster. Seventy-five percent of the owner-occupied homes had a mortgage. The median monthly housing cost (mortgage, taxes, insurance, utilities) for those with a mortgage was \$2,782, and for those owners without a mortgage, the cost was \$517 a month. Median rent was \$1,692, and more than half of the renters who pay rent were paying more than 30 percent of their income for housing.

In sum, housing costs pre-disaster were substantial. The high costs and relatively modest supply growth helps explain the very high rates of overcrowding pre-disaster.

Table 11. Occupied Housing Units Select Characteristics in Census Tracts 031402, 031404, 031405

Occupied housing units	3,480
Owner Occupied	50%
Renter Occupied	50%

Overcrowding 1.01 to 1.50 persons per room	13%
Overcrowding 1.51 or more	5%
Owner Occupied Units	1,729
Median Self-Reported Value (2021)	\$729,071
With a Mortgage	75%
Median Monthly Cost with mortgage	\$2,782
Median Monthly Cost without mortgage	\$517
Renters Paying Rent	1,666
Median Rent (2021)	\$1,692
Renters paying more than 30% of income for rent	53%

Source: 2021 5-Year ACS

Demographic County Wide Information

While the disaster damage is concentrated in the three Census Tracts discussed above, the impact of the disaster on the overall housing market is substantial due to the loss of housing inventory in a market that was already underbuilt for year-round residents relative to housing demand.

Table 12 presents demographic and disaster registrant information for the state of Hawaii and zip codes within the declared county of Maui. Note that the zip code populations range from large (zip code 96753) to very small (zip code 96713).

Table 12: Population, Poverty, and Potentially Vulnerable Groups

Location	Pre-Disaster			Post Disaster Owner Registrants			Post Disaster Renter Registrants		
	Population	Poverty Rate	Population 60+	FEMA Registrants	HH with Member 60+	HH with AFN Member	FEMA Registrants	HH with Member 60+	HH with AFN Member
Hawaii	1,440,196	9.5%	24.9%	4,969	1,992	671	7,969	1,996	1,233
96713	938	18.0%	33.7%	39	11	3	18	3	3
96732	26,361	6.5%	25.8%	655	136	61	485	143	97
96753	29,547	9.3%	27.7%	902	301	74	610	181	61
96761	23,473	9.3%	23.1%	2,978	1,544	489	6,856	1,599	1,060

Source: American Community Survey 2021 5-year data

Location	Pre-Disaster			Post Disaster Owner Registrants			Post Disaster Renter Registrants		
	Population	Poverty Rate	Population 60+	FEMA Registrants	HH with Member 60+	HH with AFN Member	FEMA Registrants	HH with Member 60+	HH with AFN Member
Hawaii	1,440,196	9.5%	24.9%	4,969	1,992	671	7,969	1,996	1,233
96713	938	18.0%	33.7%	39	11	3	18	3	3
96732	26,361	6.5%	25.8%	655	136	61	485	143	97
96753	29,547	9.3%	27.7%	902	301	74	610	181	61
96761	23,473	9.3%	23.1%	2,978	1,544	489	6,856	1,599	1,060

Source: American Community Survey 2021 5-year data

Selected ACS data for the zip codes within the declared County of Maui (as well as the State) are provided in Tables 13 and 14. Several categories of information are highlighted and discussed later in the document to emphasize zip codes which may have particularly high (or low) values.

The four affected zip codes within the declared County of Maui have a combined population of 80,319 comprising 5.6% of the total Hawaii population. The most populous zip code, 96753, has a population of 29,547. Zip codes 96732, 96753 and 96761 round out the top 3 most populous zip codes. There are three zip codes that have populations exceeding 20,000 people. In contrast, the smallest zip code (96713) has a population under 1,000.

Although the smaller zip code may have a comparatively small portion of the County of Maui’s disaster survivors, consideration of the housing impacts and recovery in the zip code is critical for not only the economic resilience of those areas but for the State’s economy. To consider the housing need of the affected population will require looking beyond the total number of registrants or damage.

Age and Family Size

The portion of people in the disaster affected the County of Maui zip codes under 18 years of age is widespread and ranges from 2.10% - 3.1% with zip code 96708 showing the least percentage. The State of Hawaii shows 21.4% of the entire population is under the age of 18. The highest rate of population under 18 years of age is 23.6% in zip code 96708. Zip codes 96732 and 96761 are tied for the largest average family size at 3.6. For the portion of people in the 60+ age cohort, the range is 23.1% - 33.7% compared to Hawaii’s 24.9% statewide. Zip code 96713 shows the highest percentage of households with a member over the age of 60 at 33.7%. Communities with high percentages of young and/or residents aged 60 and over may face increased recovery challenges because these segments of the population may require more resources to support their recovery.

Table 13: Age and Family Size

Location	Population	Age, percent		Family Size
		Under 18	60+	
Hawaii	1,440,196	21.40%	24.90%	3.5
96708	11,213	23.60%	23.80%	3.1
96713	938	16.10%	33.70%	3.3
96732	26,361	20.90%	25.80%	3.6
96753	29,547	17.50%	27.70%	3.2
96761	23,473	23.30%	23.10%	3.6

Sources: State population data—Census Bureau 2022 Population Estimates; all other data uses 2021 ACS 5-year data

Multigenerational Households

The housing dynamics in Hawaii are quite unique compared to living on the mainland. Many of the households consist of parents and their children, as well as grandparents, uncles, aunts, and cousins. This household composition, referred to as the ohana (family) creates multigenerational households and is very commonplace on the islands.¹⁰ Sometimes these households will also include non-relatives who are part of the extended family. According to the 2021 US Census, there were 1,440,196 people living in Hawaii, and 215,726 of its

¹⁰ Activating Educators Focus on Family Engagement as Central to Teaching. (n.d.). Partnering With Diverse Population. Activating educators’ focus on family engagement as central to teaching. <https://affect.coe.hawaii.edu/lessons/homelesstransitory/>

population living in multi-generational households. These households have at least three generations living under the same roof, which make up nearly 35,946 multi-generational households.¹¹

In the US, nearly 20% of all Native Hawaiian and/or other Pacific Islander households are multi-generational. Hawaii leads the nation in the percentage of population reporting they live in multigenerational households at 9.1%. According to 2020 census data, 9.0% of the County of Maui’s population lived in multi-generational households.¹² These households can be found mostly in urban communities and may need to consider the square footage, number of rooms, and if the rooms are adequate in the housing units. Households with children and or elderly may need or prefer to be located closer to services such as medical facilities, schools, grocery stores, etc. This could have a substantial impact on recovery housing location.

Income, Education, Disability, Race and Limited English Proficiency

No zip codes have a median household income above the statewide figure of \$88,005. Zip code 96708 has the highest median household income at \$85,941. Of the affected zip codes, two have a household income below 75% of the statewide median income.

Table 14: Income, Education, Disability, Race and LEP

Location	Household Income (2021)		Education		Disability, all ages	Race (Not Hispanic or Latino)					Hispanic or Latino	Limited English Proficiency (LEP)
	Median	Mean	No HS Grad	Bachelors or Higher		White	Black or African American	American Indian and Alaska Native	Other	Native Hawaiian		
Hawaii	\$88,005	\$113,310	7.3%	34.3%	11.4%	21.3%	1.8%	0.2%	55.8%	9.8%	10.9%	11.2%
96708	\$85,941	\$101,216	10.6%	29.8%	8.1%	48.0%	0.1%	0.2%	9.0%	5.6%	19.4%	2.5%
96713	\$50,486	\$70,185	2.3%	29.4%	7.6%	32.7%	0.0%	0.0%	18.3%	48.1%	0.9%	0.0%
96732	\$85,890	\$102,466	12.0%	26.0%	9.3%	8.6%	0.7%	0.1%	71.5%	10.0%	9.1%	22.0%
96753	\$83,322	\$121,052	4.6%	35.1%	10.3%	49.1%	0.8%	0.0%	33.9%	3.4%	12.7%	6.4%

Source: 2021 ACS 5-year data

Note: "Other Race" includes Asian alone, some other race alone, and two or more races; Native Hawaiian also includes other Pacific Islander alone.

The breakdown of race in the State of Hawaii is 21.3% White, 55.8% other, 9.8% Native Hawaiian, and 10.9% Hispanic or Latino. Zip code 96753 for the affected area showed the highest percentage for White at 49.1%. Zip code 96708 show the highest percent of Hispanic population at 19.4% whereas, the percentage was lower for Native Hawaiian and other populations.

Income Levels

Recovery costs may be borne by insurance, savings, loans, or external assistance. The ability to address the financial demands of disaster recovery at the individual, family or household level is often a function of

¹¹ Bureau, U. S. C. (n.d.). *Explore census data*. Explore Census Data. <https://data.census.gov/>

¹² USAFacts. (2023, December 5). *How common are multigenerational households in the US?* <https://usafacts.org/articles/how-common-are-multigenerational-households/>

household income. The median household income for Hawaii is \$88,005 (with a mean of \$113,310). The median household income in the affected zip code ranges from \$50,486 to \$85,941 (the mean household income ranges from \$121,052 to \$70,185). Of the affected zip codes, 100% have a median household income below the state median income level. Zip code 96713 has the lowest median household income at \$50,486. No zip codes have a median household income above the statewide median income.

The County of Maui has a segment of their population who derive a portion of their household income from Social Security and/or Retirement sources. According to the ACS 2022 1-year data, the County of Maui has a total population of 164,268. The number of households in the County of Maui receiving income from Social Security is 22,835 and the number of households receiving income from some form of retirement other than Social Security is 16,350.¹³ These two groups can overlap with some households having only social security, some having only retirement income, and many that have both. Residents whose only source of income is either Social Security and/or retirement income, may face additional recovery challenges due to limited access to resources.

Education

Education can be described by the two ends of the spectrum, those without a high school diploma and those with a bachelor's degree or higher. In Hawaii 7.3% of the residents lack a high school diploma and 34.3% possess a bachelor's degree or higher. In the County of Maui, 27% of the adult population are high school graduates with no higher educational degrees. 29% of the population have acquired a bachelor's degree or higher in the County of Maui. Within the County of Maui, zip codes 96708 and 96732 exceed the statewide average of the population without high school diploma at 10.6% and 12% respectively. In the affected zip codes, the population without a high school diploma ranges from 2.3% in zip code 96713 to a high of 12% in zip code 96732.

For residents with a bachelor's degree or higher, the Hawaii average is 34.3%. Zip code 96753 (35.1% is the only zip code that exceeds the statewide average of residents with a bachelor's degree or higher. In the affected zip codes, the percentage of the population with a bachelor's degree or higher ranges from 26% in zip code 96732 to 35.1% in zip code 96753.

Those without a bachelor's degree may experience limited options with respect to employment in their recovery from the disaster, particularly if businesses close or modernize as part of the recovery. Additionally, this may impact state or local economic development initiatives that require increased educational attainment for the workforce.

Disability

Individuals with disabilities face additional challenges with respect to disaster recovery. The Hawaii estimates for individuals with a disability is 11.4%. Zip code 96753 is the highest percentage of the population with a disability at 10.3%.

¹³ American Community Survey 2021 [Census | American Community Survey \(hawaii.gov\)](https://www.census.gov/american-community-survey)

Planning for individuals with disabilities is essential as they often need additional housing considerations, particularly individuals with mobility challenges.

Race

Race may play a role in engaging and assisting disaster survivors as lines of communication and community priorities may differ among different races. According to ACS, while 9.8% of the Hawaii population identifies as native Hawaiian, in the affected zip codes that ranges from 3.4% (zip code 96753) to 48.1% (zip code 96713).

The Other race population (55.8% of Hawaii's population) in the affected zip codes are highest in zip code 96732 at 71.5%. Blacks or African American population, and the White population, comprise 1.8% and 21.3% of Hawaii's population respectively. The percentage of American Indian and Alaska Native in the affected zip codes is the highest in zip code 96708 at .2%.

Limited English Proficiency (LEP)

Engaging in the recovery process is challenging for all survivors, particularly those with limited English proficiency. According to the ACS 2022 1-year data for the County of Maui, there are 123,887 individuals that speak English only and 31,812 that speak another language. There are 13,376 that do not speak English well, which makes up 8.6% of the population 5 years or older.¹⁴

- The top five languages spoken in the County of Maui, other than English, are Ilocano, Tagalog, Spanish, Hawaiian and Japanese. According to the Hawaii State Data Center, the two languages most often spoken in the home, other than English, are Ilocano and Tagalog. The Data Center report indicates that the number of residents that speak Ilocano and Tagalog is 8,665, and 6,119 respectively. Of the 8,665 that speak Ilocano, 5,000 or 57.7% speak English "less than very well" and of the 6,119 that speak Tagalog 3,343 or 54.6% speak English "less than very well."¹⁵ Having program forms, website, and other available resource information translated into these languages, along with sign language, and braille translations would benefit these populations.

¹⁴ American Community Survey 2022 [Census | American Community Survey \(hawaii.gov\)](https://www.census.gov/data/tables/2022/census/american-community-survey/hawaii.html)

¹⁵ Detailed Languages Spoken at Home.

https://files.hawaii.gov/dbedt/census/acs/Report/Detailed_Language_March2016.pdf

Impacts to Housing

FEMA Verified Loss Information

As seen in Table 15, eight of the zip codes in the affected area showed a higher than zero-dollar amount for total FEMA verified loss (FVL) of real and personal property.

Table 15 indicates that in the County of Maui, zip code 96761 received the most real property and personal property damage totaling \$122,817,461 and \$33,139,255 respectively.

The only remaining zip code reporting a substantial amount of FVL was 96790 (Kula), where its real and personal property damage totaled \$743,823 and \$140,387 respectively.

Zip code 96761 accounts for 99.2% of all real and personal property damage as recorded during the FEMA inspection process for the FEMA declared disaster.

Regarding zip code 96761, Table 16 shows that 72.2% of the total real property FEMA verified loss amount was associated with applicants that reported that they did have home-owners insurance coverage at the time of FEMA registration. Those applicants that reported having no home-owners insurance coverage account for 27.8% of the total real property FEMA verified loss for this zip code.



Table 15: FEMA Verified Loss by All Zip Codes

Zip Code	RP FVL	PP FVL	Total FVL	%of Total
96708	\$292,915	\$16,824	\$309,739	0.20%
96753	\$0	\$2,671	\$2,671	0.00%
96761	\$122,817,461	\$33,139,255	\$155,956,717	99.23%
96767	\$0	\$7,652	\$7,652	0.00%
96768	\$0	\$4,498	\$4,498	0.00%
96790	\$743,823	\$140,387	\$884,210	0.56%
96793	\$0	\$1,358	\$1,358	0.00%
Totals	\$123,854,199	\$33,312,645	\$157,166,843	

Source: FEMA FIDA Report 34761, March 12, 2024

Table 16: FEMA Verified Loss Zip Code 96761

Zip Code 96761		
Owners with RP FVL - HOI Insurance	Total RP FVL	% of Total
Owners RP FVL w/HOI	\$88,170,262	72.2%
Owners RP FVL wo/HOI	\$33,887,928	27.8%
Total RP FVL	\$122,058,190	

Source: FEMA FIDA Report 34761, March 12, 2024

Table 17 shows that a total of 4,018 units in the impacted area were deemed to be destroyed during the FEMA inspection process. Of the destroyed residences, 60.1% were House/Duplex residence type and 4.9% were Condo residence type. The County of Maui zip code 96761 has the most destroyed units at 4,003.

Zip code 96761 accounts for 99.6% of all destroyed units in the FEMA declared disaster as recorded during the FEMA inspection process.

Table 17: Destroyed Units All Zip Codes

Zip Code	Apartment	Assisted Living Facility	Boat	Condo	House/ Duplex	Mobile Home	Other	Townhouse	Travel Trailer
96708					1				
96761	1,306	4	2	194	2,401	5	30	45	16
96790				1	11		1		1

Source: FEMA FIDA Report 34761, March 12, 2024

Table 18 representing zip code 96761, shows that 89.8% of the destroyed residences in the zip code were renter occupied units. Insured applicants must provide documentation that identifies their insurance settlements or benefits before FEMA will consider their eligibility for categories of assistance that may be covered by insurance. After an applicant submits their insurance settlement information to FEMA, FEMA will request an inspection if the adjusted net insurance settlement for any covered period is less than the financial Housing Assistance and/or Other Needs Assistance maximum award amounts. If an applicant states at registration that they have insurance but later submits a written letter to FEMA stating that they do not have insurance, FEMA will issue an inspection.

Table 18: Destroyed by Type and Tenure Zip Code 96761

Residence Type	Owner Destroyed by Type	Renter Destroyed by Type
Apartment	0	1,306
Assisted Living Facility	0	4
Boat	0	2
Condo	94	100
House/ Duplex	295	2,105
Mobile Home	3	2
Other	0	30
Townhouse	12	33
Travel Trailer	5	11
Total Destroyed	409	3,593
% of Total	10.2%	89.8%

Source: FEMA FIDA Report 34761, March 12, 2024

Table 19 reflects FEMA applicants who have a level of damage recorded during the FEMA inspection process. Zip Code 96761 recorded the highest concentration of owner and renter occupied households with FEMA damage at 19.3% and 55.2% respectively. The lowest concentration of renter occupied households with FEMA recorded damage level at 0.3% is in zip code 96753.

Table 19: Damage Level – Owner/Renter

Zip Code	Owners						Renters					
	FEMA Registrations	Destroyed	Major	Moderate	Total Owners w/FEMA Recorded Damage	% of Total Owners w/DMG LVL	FEMA Registrations	Destroyed	Major	Moderate	Total Renters w/FEMA Recorded Damage	% of Total Renters w/DMG LVL
96708	219	1	0	0	1	0.5%	220	0	0	0	0	0.0%
96753	914	0	0	0	0	0.0%	625	0	0	2	2	0.3%
96761	3,117	409	8	186	603	19.3%	7,317	3,588	0	450	4,038	55.2%
96767	7	0	0	0	0	0.0%	7	1	0	0	1	14.3%
96768	315	0	0	0	0	0.0%	380	0	0	6	6	1.6%
96790	640	2	0	25	27	4.2%	495	12	31	0	43	8.7%

Source: FEMA FIDA Report 34761, March 12, 2024

Impacts to Affordable Housing

The number of housing units in Maui County pre-disaster was insufficient to meet the housing demand, especially the need for affordable housing units. While the County of Maui may have adequate rental housing inventory, most of that rental unit inventory is used for Short-Term Rentals (STRs), which can yield unit owners substantial rental income. Long-term rentals may not provide unit owners with similar income levels. For those impacted by the wildfires, finding suitable housing appropriate for all income levels has been challenging.

The State, the County of Maui and FEMA continue to work collectively to identify temporary and long-term housing options, including affordable housing options, for all displaced residents. There are a variety of options being employed including FEMA’s rental assistance programs, the County’s host housing support, as well as the State’s rental assistance program. The subsidy amounts for each of these options varies with rental assistance providing up to 175% of HUDs FMR, host housing support is providing up to \$375/month per survivor, and Direct Lease is providing up to 400% of HUDs FMR. These subsidized rental rates represent a significant increase in rental costs/payments and may have a long-term detrimental impact on the rental market. Historical housing data suggests that once rents go up, it is unusual to see them decrease without some seismic changes in the rental market and/or economy. Moderate- and lower-income households may become priced out of the market and will need to seek alternative housing.

As recovery ensues and new developments are planned, the impact of these current rental increases could impact and re-define affordability for the County of Maui.

Pre-Disaster Publicly Assisted Housing Inventory Impacted:

There were 636 publicly assisted rental units that were destroyed or damaged by the August 8, 2023, Lahaina wildfire.

Table 20: Publicly Assisted Affordable Units -Damaged in Lahaina

Property Name	Population Served	Units Damaged
34 Kulalani St.,	Single Family Home	1
1351 Kaeo St	Single Family Home	1
Crossroads	Family	20
David Malo Circle	Family	18
Front Street Apartments	Family	142

Hale Mahaolu Eono	Elderly	35
Hale Mahaolu Eono 5	Elderly	5
Komohana Hale	Family	20
Kaiaulu o Kupuohi	Family	89
Lahaina Surf	Family	112
Piilani Homes	Elderly	42
Weinberg Court	Family	62
Total Units Lost		636

Source: Hawaii Housing Finance Development Corporation & HUD

HUD Office of Public and Indian Housing

The PIH portfolio in the one FEMA Individual Assistance (IA) designated county from Hawaii Wildfires (DR-4724) includes three Public Housing Agencies (PHAs) supporting 4,731 public housing (PH) households and approximately 7,515 Housing Choice Voucher (HCV) households. Of the three PHAs in the FEMA IA designated county, two reported displacements totaling 109 PIH families at peak impact. Of those displacements, 41 (37%) were PH displacements and 68 (62%) were HCV displacements. Reports indicate that there was minimal damage in some areas and total losses in other areas in the portfolio.

As of January 31, 2024, approximately 56 (51%) of the 109 displaced families have been rehoused. This includes 60% of displaced HCV families and 63% of PH families having been rehoused.

Table 21: Office of Public and Indian Housing Assisted Portfolio

Disaster Field Office PHA	Housing Choice Vouchers				Public Housing					
	% Rehoused	Total Rehoused	Total Currently Displaced	Total Ever Displaced	% Rehoused	Total Rehoused	Total Currently Displaced	Total Ever Displaced	Total Units Damaged	Estimated Repair Costs
Hawaii Wildfires (DR-4724-HI PIH Report October 24, 2023)	Sum of % HCV Rehoused	Sum of HCV Displaced and Rehoused	Sum of HCV Total Currently Displaced	Sum of HCV Total Ever Displaced	Sum of %PH Rehoused	Sum of PH Displaced and Rehoused	Sum of PH Total Currently Displaced	Sum of PH Total Ever Displaced	Sum of PH Units Damaged	Sum of Total Repair Cost
HI001: HPHA	0%	0	0	0	63%	26	15	41	60	\$ 30,000,000
HI002: Hawaii Co	0%	0	0	0	0%	0	0	0	0	\$ -
HI004: Maui Co	60%	41	27	68	0%	0	0	0	0	\$ -
Honolulu Field Office Sum	60%	41	27	68	63%	26	15	41	60	\$ 30,000,000

The PIH Field Office reports that public housing damage assessments have been completed, however insurance negotiations are ongoing. As of January 31, 2024, an estimated \$30,000,000 in damages were reported and two buildings were reported as total losses.

HUD Office of Housing - Multifamily Family Housing:

There are 23 HUD multifamily housing properties in the impacted counties declared for FEMA IA. These properties either have a Federal Housing Administration (FHA) insured mortgage, Project Based Rental Assistance, Deed Restriction Covenants (Use Agreement), or a combination of these Business Agreements. Of these, 17.39% of the properties sustained damage. Table 22 below reflects the level of damage reported by property owners.

Table 22: HUD Multifamily Housing Program Property Damage

	Number of Properties	Total Units	Total Assisted Units
	23	801	693
No Damage	18	658	642
Minor Damage	1	6	5
Modest Damage	0	0	0
Severe Damage	3	137	46
No Assessment	0	0	0

The timeframe for restoration completion on properties reporting damage is dependent on several factors, including timing and amounts of insurance settlements and availability of construction materials and contractors. HUD encourages property owners to include resiliency improvements in their rehabilitation/reconstruction strategies.

As a result of the event, there are 143 households displaced. These households are in temporary housing. Where possible, owners will bring units online in stages as they receive clearances from local authorities. In some cases, environmental unit/building air quality testing is completed prior to resident re-occupancy. Safety of the residents is HUD’s primary concern with re-occupancy.

Insurance settlements and debris removal are the two most significant factors in determining re-occupancy and the estimated restoration completion date. Property and owner funding shortfalls impact the owner’s ability to return properties to fully operational as well. Assisted/Subsidized housing properties, in general, have a low profit margin and rent restrictions, and therefore the ability to generate additional cash flow to fill restoration funding gaps is unlikely. In addition, properties that take more than nine months to restore are generally facing increased premiums at insurance binding/renewal that further stress the financial operations and viability of multifamily properties, most specifically the assisted/subsidized portfolio.

HUD has several multifamily housing mortgage insurance programs for rebuilding or refinancing that can assist multifamily property owners following a disaster. The Section 223(f) program can be utilized to refinance properties that require rehabilitation, but do not require substantial rehabilitation and construction. This program does not require any previous HUD affiliation/activity. Section 221 (d)(4) program is for newly constructed or substantially rehabilitated multifamily rental housing. Detailed information on all of HUD’s programs can be found at: <https://www.hud.gov/sites/dfiles/Main/documents/HUDPrograms2020.pdf>.

HUD Office of Housing - Single Family Housing

Table 23 reflects the FHA Insured - Single Family Housing portfolio as of January 31, 2024. There are several Single-Family Housing Programs available to assist survivors with restoring their residences.

At the declaration of a Presidentially Declared Disaster (PDD), a foreclosure moratorium was triggered that protects FHA and borrowers from the initiation or continuation of a foreclosure action for a 90-day period. The foreclosure moratorium for borrowers was set to expire on November 8, 2023; however, HUD has extended the

foreclosure moratorium until January 1, 2025. The moratorium was also extended to the Native Hawaiian Housing Loan Guarantee (Section 184A) program.

HUD offers two programs that can assist homeowners impacted by the disaster with Sections 203(h) Mortgage Insurance for Disaster Victims and Section 203(k) Rehab Mortgage Insurance. Section 203(h) mortgage insurance helps make it easier for survivors to obtain a loan to purchase or rebuild a home. Whereas Section 203(k) loans program help survivors secure a loan to buy and/or rehabilitate their home impacted by the disaster.

Of the FHA Single-Family loans in the PDD shown on Table 23, 28 are located in the Lahaina burn area perimeter.

Table 23: Insurance in Force and Loan Count as of January 31, 2024

This table will not itemize and provide counts for each individual county, rather, it will tally up all the counties in the PDD and provide a total.

COUNTIES IN DISASTER DECLARATION Only or for location specified in the request	Forward Count	Unpaid Principal Balance for Forward	HECM Count	Unpaid Principal Balance for HECM	Total Loan Count (Forward and HECM)	Total UPB (Forward and HECM)
1	1,340	\$456,226,866	285	\$130,187,140	1,625	\$586,414,007

USDA Rural Development (USDA RD) Single Family and Multifamily Housing Programs

USDA RD’s Multifamily Housing portfolio in the County of Maui includes eight properties (1 on Lanai and 7 on Maui) consisting of a total of 298 units. The seven properties located on Maui Island consists of 274 units, the remaining 24 units are on the island of Lanai.

Of the total 298 units, there are 158 units with Rental Assistance, a project-based subsidy that ensures tenants do not pay more than 30 percent of their income on rent.

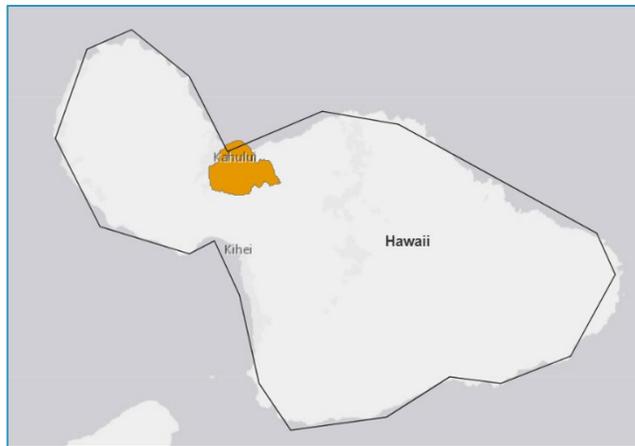
Hale Mahaolu Eono, located on the island of Maui, was destroyed in the fires. This 30-unit property was financed by USDA RD with 10 units receiving USDA RD Rental Assistance and 20 units receiving HUD’s project-based rental assistance. HUD provided financing for an additional 5 units that also received HUD Section 8 project based rental assistance. Of the remaining seven properties, one other was affected with minor cosmetic damage that did not impact habitability of the units, but all other properties were spared from damage.

At the time of the fires, two units at Hale Mahaolu Eono were vacant, displacing 29 tenants. USDA RD provided Letters of Priority Entitlement (LOPE) to all displaced tenants. LOPE letters allow displaced tenants to have priority to occupy vacant USDA RD units nationwide. In addition, USDA RD has the Priority Placement program, which allows FEMA registrants priority to occupy vacant units nationwide if they meet program eligibility.

Table 24: Table of USDA RD Financed Properties in the County of Maui

Project Location Island/City	Project Type	Total Units	Total Units with RA	Project Status
Maui/Kahului	Family	60	6	Not impacted
Maui/Kahului	Family	62	0	Not impacted
Maui/Kihei	Elderly	34	34	Not impacted
Maui/Kihei	Elderly	30	30	Not impacted
Maui/Lahaina	Elderly	30	9	Destroyed
Maui/Lahaina	Family	56	55	Minor cosmetic, units not impacted
Maui/Kula	On-Farm	2	0	Not impacted
Lanai/Lanai City	Elderly	24	24	Not impacted

Figure 9: Map of Area Ineligible Area for USDA RD Programs



Sources: USDA RD (Single Family Housing) Map above shows ineligible areas on Maui Island highlighted in orange for USDA Rural Development’s Single Family Housing Programs. Most of the island is considered rural outside of Kahului.

USDA RD’s Single-Family Housing portfolio across the County of Maui consisted of 164 loans made directly to borrowers (50-80% of area median income) with an unpaid balance of \$24.5 million and 145 loan guarantees for borrowers (115% area median income) with an unpaid balance of \$47.6 million. Of the total 309 borrowers, 187 are in the County of Maui with a total unpaid balance of \$51.6 million. This includes 65 direct borrowers with approximately 10.5 million in unpaid principal and 122 guaranteed borrowers with \$41.8 million in unpaid principal. Impacts in the zip code 96767 include two direct borrowers with an unpaid balance totaling approximately \$140,000. In the same zip code, there are an additional 24 guaranteed borrowers with an unpaid balance of \$6.8 million.

USDA RD issued “We Care Letters” offering program assistance including payment assistance and moratoriums to direct borrowers in the County of Maui. Additional guidance was provided to holders and loan servicers of guaranteed mortgages to offer eligible borrowers a foreclosure moratorium and forbearance options.

Impacts to Other Populations

Homeless Population

According to HUD’s 2022 annual homelessness assessment report presented to US Congress, approximately 582,462 people were experiencing homelessness on any given night in the US. In this assessment, homelessness includes those in shelters, transitional housing, living on the street, and other places not suitable for habitation. Hawaii was ranked fourth per capita in the nation related to homelessness, with a rate of 42.4 per 10,000 people, which is more than double the national average. After the wildfire, the pre-disaster homeless population was housed in FEMA’s Safe Harbor program for 45 days. Then the State relocated this population to a tent city located on State land near Kahului’s airport entrance. They consulted with the State of Oregon which is experienced in implementing this type of housing plan. The site is called Pu’uhonua o Nene, which shelters adults with no minor children and includes air-conditioned tents with cots, and on-site medical facilities. Meals are being provided daily, and transportation is available for those who have medical appointments. [Project Vision Hawaii](#), a nonprofit based on Oahu, is partnering with the Hawaii Department of Human Services to provide wrap around services.¹⁶

As outlined in Table 25, using the Point in Time (PIT) count data for 2023 indicates that over 2,195 individuals were experiencing homelessness in Hawaii prior to the wildfire. As of January 2023, the County of Maui count of individuals experiencing homelessness was 704. Maui has the most individuals in some form of shelter with a count of 317, compared to Hawaii and Kauai which had 278 and 58 respectively. Maui was successful in sheltering almost half of its homeless population.

This loss of rental units, especially affordable units, presents more of a challenge in attempting to house the homeless population in Maui. Since the available affordable rental housing inventory was minimal prior to the wildfires, unit availability has been exacerbated. It will be difficult for survivors to identify rental units on Maui because it will take minimally two years to initiate rebuilding efforts. Fewer available rental units, with an increased demand, will drive rental prices higher, making rental units more unaffordable for the lowest income populations.

Table 25: 2023 Homeless Point-In-Time Count (1/22/23)

	Hawaii	Kauai	Maui	Total
Sheltered				
Emergency Shelter – Family Individuals	82	23	239	344
Emergency Shelter – Individuals	107	14	78	199
Transitional Housing – Family Individuals	72	15	0	87
Transitional Housing – Individuals	17	6	0	23
Total Sheltered	278	58	317	653
Unsheltered				
Family Individuals	55	96	36	187
Individuals	670	334	351	1,355
Total Unsheltered	725	430	387	1,542
PIT Total	1,003	488	704	2,195

Source: HUD Honolulu Field Office (CoC PIT 2023)

¹⁶ Sousa, T. de, Andrichik, A., Cuellar, M., Marson, J., Prestera, E., & Rush, K. (n.d.). *The 2022 Annual Homelessness Assessment Report (AHAR) to Congress. 2022 AHAR: Part 1 - PIT Estimates of Homelessness in the US* <https://www.huduser.gov/portal/sites/default/files/pdf/2022-AHAR-Part-1.pdf>

Hidden homeless households have similar characteristics as homeless individuals and families, which includes those individuals or families living in overcrowded housing units or illegal structures.¹⁷ This group tends to double up, rent out small rooms, live in less than acceptable living conditions and/or live with friends or family members. With the lack of affordable homes for low to moderate income households, it is common for the hidden homeless to live in their cars, encampments, or homes that are overcrowded and unsafe.¹⁸

HUD awarded \$1.3 million of Rapid Unsheltered Survivor Housing (RUSH) funds to the State of Hawaii on August 23, 2023. These funds are utilized to assist households experiencing homelessness or housing instability in certain areas impacted by the wildfires. HUD awarded Hawaii a second allocation of \$6.9 million on February 9, 2024. The program provides time-limited housing support, financial assistance, and stabilization services, including:

- Rental Assistance: rental assistance and rental arrears
- Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, housing re-location costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

Catholic Charities was awarded a contract to provide the service and is projecting to service 78 families and 60 individuals for the initial award of RUSH funds.

Elderly and Access and Functional Needs (AFN) Population

The County of Maui has 94,225 adults ranging in age from 18 to 64 with 6,710 or 7.1% that have a disability. There are 34,163 adults aged 65 or older with 10,346 or 30.1% of those that have a disability. Elderly populations and/or those with access and functional needs (AFN) experience disparate impacts following a disaster. These populations often require more resources and are much more difficult to rehouse because of their special needs, including mobility or access needs.

Immigrant Population

During a disaster, there are impacted populations, that due to their citizenship or immigration status, might be considered vulnerable. This population's recovery might be negatively impacted due to their possible ineligibility for certain federal programs, their lack of knowledge of available resources or because they have inaccurate information regarding resources that are available to them. This population may also include individuals that may have lost their documentation providing legal status and/or may have had loss their legal status due to expiration or other means. Tracking the need and/or services and resources provided to this population may be difficult to estimate due their reluctance to seek assistance due to fear of deportation.¹⁹

¹⁷ KAWAKAMI, J. (2018, June 22). *Maui's "hidden homeless" live temporarily with others*. mauinews.com.

<https://www.mauinews.com/opinion/columns/2018/06/mauis-hidden-homeless-live-temporarily-with-others/>

¹⁸ *Accessory dwelling units*. Hawai'i Appleseed. (n.d.). <https://hiappleseed.org/publications/accessory-dwelling-units-affordable-housing-hawaii>

¹⁹ America Public Health Association. (2006, November 8). *Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States*. APHA Policy Statements and Advocacy. <https://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2014/07/23/17/36/addressing-the-needs-of-immigrants-in-response-to-natural-and-humanmade-disasters-in-the-us>.

As a result of the March 9, 2024, passage of the Compact Impact Fairness Act, which amends the “qualified alien” statute under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Compacts of Free Association (COFA) citizens who legally reside in the United States are now eligible to receive FEMA assistance. In Hawaii, they can apply for FEMA disaster assistance if their primary home was impacted by the wildfires. The PRWORA now includes the citizens of the Federated States of Micronesia, the Republic of Palau, and the Republic of the Marshall Islands.

Stakeholder Engagement

Overview

Stakeholder engagement conducted by the Housing RSF thus far has been limited. Due to the substantial and overwhelming nature of the damage and destruction caused by the wildfires, executing a stakeholder engagement plan has been delayed because of the need to provide additional time and space for the community and its residents to thoroughly digest the impacts on the community's physical and cultural assets. There has also been a significant emotional toll on residents given the loss of over 100 individuals.

As a vision for the future and recovery planning takes a more prominent space in the lives of those that have been impacted, the Housing RSF will expand its recovery work to include more stakeholder engagement. We will continue to work closely with the Community Assistance RSF and others RSFs, State, County, and local stakeholders to identify appropriate individuals and organizations to conduct outreach and gather feedback.

The State Joint Housing Task Force established a subcommittee that will focus on the long-term housing recovery needs for the County of Maui. The following entities are part of the Permanent Housing Subcommittee led by the County of Maui Housing RSF:

- The County of Maui Department of Public Works, the County of Maui Department of Housing and Human Concerns, HUD, USDA RD, SBA, Hawaii Office on Homelessness and Housing Solutions, Hawaii Housing and Finance Development Corporation (HHFDC), Hawaii Department of Education, Hawaii Public Housing Authority, Hawaii Emergency Management Agency, Hawaii Department of Human Services, and Hawaii Community Foundation

The County of Maui Department of Planning has extensive experience obtaining community involvement early in the planning process as demonstrated in the West Maui Community Plan (2022), which designated three areas as Transit-Oriented Communities (TOCs). The Maui Metropolitan Planning Organization (MPO) conducted additional community engagement as part of its West Maui Community Corridor Action Plan process, to envision a more connected, affordable, transit-oriented community along the 3.6 miles of Honoapi'ilani Highway that links Lahaina and Kā'anapali and the areas within a half-mile of the corridor. While most technical work and outreach was done pre-disaster, the MPO worked with community stakeholders (post-disaster) to convert their input into recommendations – the "Framework for a Resilient Future" – to help support recovery and potential redevelopment in these TOC areas in Lahaina.

The County established the Office of Recovery that will oversee all the recovery efforts in Maui. The County Housing RSF will lead the efforts by chairing the Permanent Housing Solutions Subcommittee.

The Federal Housing RSF led in development in the Recovery Needs Assessment (RNA) that outlines what the housing needs would be for long-term recovery. The State and County RSF reviewed the RNA and provided comments and feedback that have been incorporated in this assessment document.

Key Recovery Considerations

Analyzing data from the County of Maui and State housing plans along with limited engagement with stakeholders provided the Housing RSF with important information on the housing needs of the County of Maui, especially the communities on the westside of Maui impacted by the wildfires. Below are six key recovery considerations as the County of Maui moves forward with their recovery plans.

1) Increase the Number of Affordable, Accessible and Resilient Rental Units

Finding affordable, accessible, and resilient housing in Hawaii can be challenging. Hawaii is one of the most expensive states to live in and has the lowest disposable income levels in the nation. It has one of the nation's highest average monthly rental and mortgage payments at \$2,423 and \$5,004 respectively. Hawaii residents also pay some of the most expensive prices for food which contributes to the high cost of living.²⁰

Before the destruction caused by the wildfires, average single-family homes in the County of Maui were selling for more than a million dollars. There was a shortage of affordable rental units, while rental prices soared, and the homeless population continues to rise. Many residents work multiple jobs just to get by and still struggle to pay their rent or resort to renting a room. Hawaiians routinely leave their native home to live on the mainland where they can explore opportunities to increase their wages and find affordable rentals or homes for sale. On November 4, 2023, CBS news reported each year 15,000 Native Hawaiians leave Hawaii and move to the mainland, of which many relocate to Las Vegas, Nevada which is called the Ninth Island of Hawaii.²¹

The County of Maui residents seeking rental units face challenges when attempting to secure a rental housing unit since the County of Maui has the highest median rental price in Hawaii. 53.7 percent of households that are renters are considered "rent burdened" meaning they pay more than 30% of their income on rent, which is the second highest behind Honolulu County with 56.7 percent. 28.6 percent of renter households are "severely rent burdened" with more than 50% of their income going to rent. With the lack of long-term affordable rental units, prices will continue to increase as the demand increases.

As the County of Maui looks at efforts to rebuild Lahaina and Kula, they will be faced with many housing challenges, including the task of rebuilding the infrastructure to support existing and new development. The identification of locations for new housing units will be determined, in part, by the ability to provide the required supporting infrastructure. Accessibility of water, sewer, and utilities will be a significant factor that aids in making decisions regarding new housing development and the overall size of housing projects. As outlined in the *State of Hawaii Strategic Plan for Transit-Oriented Development* (Hawaii Interagency TOD Council, 2018), it is far more efficient and cost-effective to provide and maintain infrastructure for compact neighborhoods with a variety of multi-story, multifamily housing types rather than for only single-family homes. Focusing new housing and redevelopment in the TOC areas recommended in the West Maui Community Plan, and in existing developed areas with Maui bus service, could save infrastructure dollars while providing better access for residents and businesses. Both the State's Strategic Plan and the County's West Maui Community Plan recommend coordinating state and county facilities investments with public and private housing development around existing or planned county transit hubs.

²⁰ Rothstein, R. (2024a, January 17). Examining the cost of living by state in 2024. Forbes.

<https://www.forbes.com/advisor/mortgages/cost-of-living-by-state/>

²¹ Yamaguchi, A., & Breen, K. (n.d.). Why Native Hawaiians are being "pushed out of Paradise" in their homeland. CBS News.

<https://www.cbsnews.com/news/hawaii-native-hawaiians-moving-cost-of-living/>

Since infrastructure and development are costly, there may be relevant funding and financing tools outlined in the recent *TOD Finance and Delivery Strategy* (Office of Planning and Sustainable Development, 2023). That Strategy also recommends developing an infrastructure master plan and financing strategy in coordination with recovery efforts.

There is a need to expand the workforce to include licensed contractors, electricians, and plumbers to build back the community that will also need housing. The recovery effort is also a significant opportunity to train local workers, high school, and college students in construction trades, project management, and related administrative and support jobs which will also minimize the need to bring mainland workers who will further strain the housing stock.

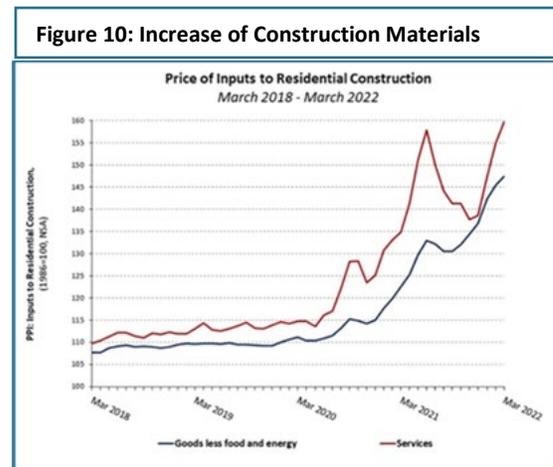
The County of Maui has been proactive in its efforts by establishing a policy of requiring developers who build 10 or more housing units are also required to ensure that 25% of the new units are affordable. This policy will assist in increasing the number of workforce housing units.

Additionally, the National Association of Home Builders (NAHB) reported that building material prices have been increasing 20.4% each year since 2020 and 33% since the start of the pandemic.²² The minimum wage increase in the State of Hawaii will have an impact cost of labor and goods as wages increase. The minimum wage was increased to \$12 in October 2022 and will increase \$2 every biennial year until 2028 to reach a rate of \$18. These wage increases will have an indirect impact on the cost of material and services in the construction industry through 2028.²³

Hawaii will also be faced with higher shipping costs to bring in the necessary construction materials and equipment through the Kahului ports via the Honolulu port and the mainland. Finding affordable housing could become even more difficult as the cost of materials to build more resilient homes will increase overall price.

The lack of affordable housing can also influence the composition of households with many households relying on extended family members and friends to pool their resources to be able to afford monthly rental or mortgage payments.²⁴ Hawaii is known, culturally speaking, for having an abundance of multigenerational households whose unique make up may include grandparents, parents, children, and extended family members. These types of households need larger housing units that can accommodate 6-12 household members.

Hawaii's housing crisis has been going on for decades. This combined with low wages, the high cost of living, and single-family homes selling for \$1 million with interest rates near 8%, makes it extremely difficult for residents to rent or buy a home. Hawaii has the lowest property taxes, allowing for investors to set their sights on housing purchases in Hawaii.



²² *Building Materials Prices Start 2022 with 8% increase*. NAHB. (2022, April 15).

<https://www.nahb.org/blog/2022/04/building-materials-prices-start-2022-with-8-percent-increase>

²³ *Minimum wage to increase to \$12.00 on October 1*. Department of Labor and Industrial Relations. (2022, September 29).

<https://labor.hawaii.gov/blog/minimum-wage-to-increase-to-12-00-on-october-1/>

²⁴ Rothstein, R. (2024, January 17). *Examining the cost of living by state in 2024*. Forbes.

<https://www.forbes.com/advisor/mortgages/cost-of-living-by-state/>

The State was already in dire need of affordable rental housing units and with the loss of thousands of residential units in the County of Maui, and specifically in Lahaina, these problems have intensified ten-fold. As new developments are planned, consideration should be given to the household structures of families living in Maui. In addition to larger homes for multigenerational ohana living, a mix of housing types and sizes should be included in each development so that extended families have the option to live nearby if they are able to afford to buy or rent their own unit. This could include Missing Middle housing – duplexes, four-plex, townhomes, accessory dwelling units (ADUs), and small to midsize multifamily buildings designed at a scale that fits with single-family housing neighborhoods.

Potential Recovery Considerations:

- Proactively develop water, sewer, drainage, roadway and electrical infrastructure to support new housing developments.
- Identify land with water and waste infrastructure near services and transit routes that can be utilized to develop new affordable housing units.
- Include the development of housing units that meet the needs of special need populations.
- Incorporate Missing Middle housing types to increase housing density in specific areas with good access to transportation and services.
- Build affordable housing units that accommodate large families with 4 or more bedrooms.
- Develop affordable housing in Lahaina to current industry standards and ensure the architectural designs are in alignment with traditional plantation home styles.

2) Strengthen Housing-Related Infrastructure for Resilient Communities

By proactively enhancing the resilience and efficiency of the water supply, sewage systems, electrical grids, and communication networks, the County of Maui can be better equipped to handle future adversities and provide a sustainable living environment for its citizens. With twenty-nine percent of Lahaina’s housing units destroyed by the wildfire, this would be an opportunity for the County of Maui to look at ways to improve its housing infrastructure that will make the community more resilient to any future disaster. Ensuring the housing infrastructure is resilient to floods, hurricanes or another wildfire would mitigate the potential damage caused by disaster and allow the community to recover quickly. The Housing RSF is working closely with the County of Maui, State and the other relevant RSFs and in particular the USACE RSF to improve the housing infrastructure and ways to mitigate future disasters. Some of the mitigation efforts to consider addressing would include drinking water, sewer problems, roadways, and electrical power.

In addition to designing individual infrastructure projects to be resilient to future disasters, infrastructure systems at the neighborhood and regional scale should be based on master planning for compact mixed-use, mixed-income neighborhoods, using the TOC principles outlined in the West Maui Community Plan. This approach is more efficient and cost-effective initially – serving more housing units per dollar of infrastructure investment. However, with less pipes and roads per house to operate, maintain, and replace over time, those initial savings continue with each generation. If the street layouts are connected, walkable, and near transit, the road investments will support improved transit service, and reduce families’ need to own a vehicle. Since there may be some near-term development of modular or prefabricated units to house impacted families quickly,

consideration should also be given to designing those neighborhoods – and sizing the infrastructure – to include sites for multifamily projects and other housing types, or future county facilities.

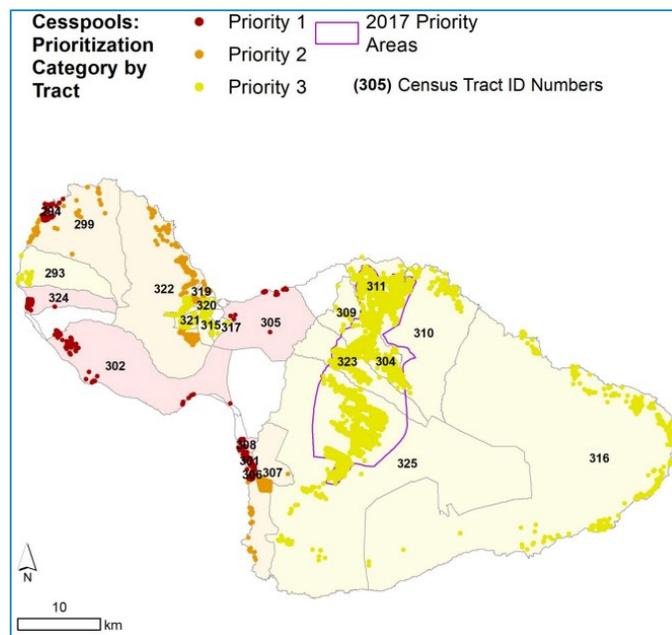
Drinking Water

The wildfires that impacted Maui have the potential to contaminate drinking water, so a watershed study will be crucial in the decision for development in the burn areas and its immediate surroundings. Research from past wildfires shows that potential contamination also impacts water wells, catchment systems, plumbing in building and drinking water systems. There has been continuous water sampling to test for volatile organic compounds (VOC) in both Lahaina and Kula. If the water in the areas designated for long term housing is compromised, it will directly impact the possible housing solutions as there are a limited number of areas identified for the development of affordable units.²⁵

Sewer Problem

There are over 11,000 cesspools that have been identified in the County of Maui. Addressing cesspools is extremely important because they could impact the limited supply of fresh drinking water. Cesspools, which is a hole in the ground that captures untreated human waste, can also be harmful to the environment as it can harm the public by contaminating our streams, ocean and more importantly our drinking water. This is an opportune time to address this problem during the recovery of Lahaina and the impacted areas in Kula with supported connection to a public sewage system.²⁶

Figure 11: Maui Census Tract of Cesspool with Priority Level



Sources: 2022 Hawaii Cesspool Hazard Assessment (Hawaii Department of Health-Wastewater)

²⁵ Maui Post-Fire Community Drinking-Water Information Hub. UHM Water Resources Research Center. (n.d.). <https://www.wrrc.hawaii.edu/maui-post-fire-community-water-info-hub/>

²⁶ 2022 Hawai‘i Cesspool Hazard Assessment & Prioritization Tool. Hawaii State Department of Health. (2022, October). <https://health.hawaii.gov/wastewater/files/2022/11/prioritizationtoolreport.pdf>

Electrical

Wildfires have been the root cause of the many disasters in our nation such as the one in Paradise, California. Utilities companies are now considering installing utility lines underground that would reduce ignition risk by 98%. The Paradise wildfire caused the Pacific Gas and Electric (PG&E) to file for Chapter 11 bankruptcy and it took them 18 months to emerge from bankruptcy.²⁷ Hawaiian Electric Company (HECO) normally installs underground lines only when the cost of installation is comparable to overhead lines unless government agencies agree to pay for the difference in cost. In light of the devastating wildfires, the County of Maui should consider underground electrical installation for all newly constructed infrastructure and any upgrades to the electric grid in Lahaina.²⁸

Renewable Energy

The County of Maui is presented with an opportunity to continue to improve on using alternative energy, which would allow Lahaina to reduce carbon emissions, making homes more energy efficient and climate resilient. The County of Maui already has one of the largest wind farms in Maui with Kaheawa Wind Power. Adding more types of renewable energy such as solar energy on the top of homes with battery storage in Maui could generate an abundance of renewable energy. This coupled with an energy efficient home would put less burden on the electrical grid and make the home more resilient, sustaining the housing stock and reducing the energy burden.

Aligning Maui's development of affordable housing with climate and/or infrastructure projects will position projects to be eligible for programs listed in Appendix 4 of the Climate Resources for Housing Supply. This could help with the planning of projects and subsidize projects by leveraging multiple funding sources.

Potential Recovery Considerations:

- Effective and strategic development and rehabilitation of housing-related infrastructure that not only meets current demands but is also more resilient to future hazards and supports county and state goals for transit-oriented communities.
- Improving the storm drainage around the impacted disaster area will help in preserving the water quality.
- Removing cesspools and connecting the homes to sewers lines as the first course of action and/or installing septic systems depending on which would yield the most advantage benefit and is cost effective.
- Prioritize resources that will allow Lahaina to install the utilities underground throughout the community that will minimize the impact of power to homes and businesses during natural disasters.
- Integrate energy efficiency projects and renewable energy into future affordable housing projects.

²⁷ PG&E bankruptcy. California Public Utilities Commission. <https://www.cpuc.ca.gov/industries-and-topics/pge/pge-bankruptcy>

²⁸ Anquiano, D. (2023, November 5). *A town re-emerges from the ashes of a devastating wildfire. but five years on, is Paradise for all?* The Guardian. <https://www.theguardian.com/us-news/2023/nov/05/california-camp-fire-rebuilding-paradise-housing>

3) Utilize Accessory Dwelling Units (ADUs) and Missing Middle Housing to Increase the Number of Available Rental Units

According to Hawaii Housing Demand: 2020-2030, the State projected needing 36,155 additional housing units by 2030, of which the County of Maui accounts for 7,039 of these housing units.²⁹ Hawaii does have a housing shortage and a lack of affordable rental units throughout the state. Twenty-five percent of households in Hawaii are comprised of a single individual, family members, and/or friends doubling up or renting out rooms. ADUs can be an alternative that could increase rental capacity and affordability. The 2019 Hawai'i Housing Planning Study³⁰ builds on the Hawai'i Housing Demand 2020-2030 projections. The Hawai'i Housing Demand report projects housing need based on population projections and other factors. The Hawai'i Housing Planning Study builds on the economic forecast projections, adding consideration for the number of units needed to accommodate those experiencing homelessness and those living in overcrowded homes. The projected need for additional housing units based on the 2019 report is ~50,000, as opposed to ~36,000.

The State has limited the land that can be used to develop affordable housing units. As construction costs rise, it becomes very difficult to build affordable resilient rental units. Consequently, utilizing ADUs may be a viable affordable option by adding additional housing inventory. Homes in the County of Maui that have the land capacity to add an ADU could be utilized to provide another source of affordable rental units.

The County of Maui recently approved the Ohana Assistance Program (OAP) that will allow the County to offer incentives to homeowners to build ADUs. This program is part of the County of Maui's homeowner revolving fund and was approved at the County of Maui Council meeting on January 26, 2024. The program will allow homeowners to apply for loans up to \$100,000 to build one ADU on lots sizes smaller than 7,500 sq. ft. and two ADUs on parcels larger than 7,500 sq. ft. The OAP will also allow for building permits to be expedited to aid in the recovery efforts.

Potential Recovery Considerations:

- Build Ohana Units/Accessory Dwelling Units (ADUs) that can be used as rental units.
- Create housing plans and designs that allow new development to include more ADU units.
- Establish a permitting program focused on expediting the permitting process for homeowners.
- Build more Missing Middle Home type such as duplex, triplex, fourplex, and courtyards.

4) Identify Ways to Reduce the Number of Short-Term Rentals (STR)

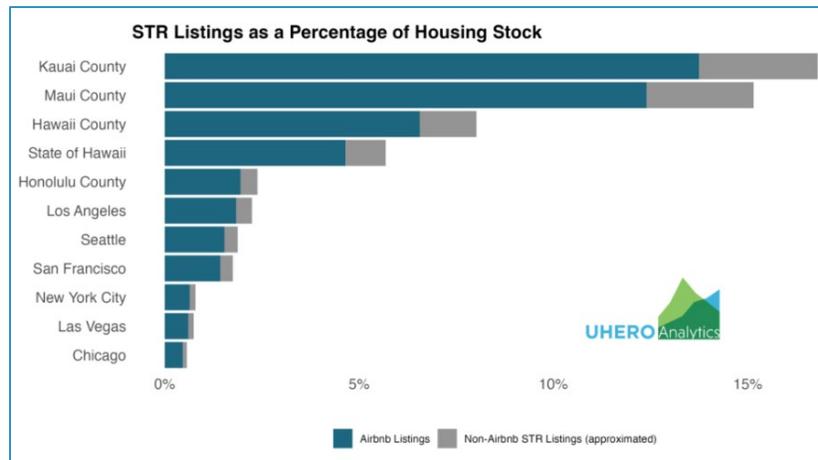
According to Maui's Automated Planning & Permitting website, there are more than 16,000 units that are legally eligible to operate as STRs in Maui. Of these eligible units, approximately 7,200 rental units were on the [Short-Term Occupancy List](#) dated April 27, 2022. Combined with 325 vacation rental permits approved in 2023 for

²⁹ *Hawaii Housing Demand: 2020-2030 & Measuring Housing Demand in Hawaii, 2015-2025. Reports & Studies. (n.d.).* https://dbedt.hawaii.gov/economic/reports_studies/

³⁰ [2019 Hawai'i Housing Planning Study](#)

[Short-Term-Rental-Homes](#) and [Permitted-Bed-Breakfast](#) bringing the total of approve STRs rental units to over 7,500.³¹

Figure 12: Short-term Rentals as a Percentage of Housing Stock



Sources: UHERO Analytics (Hawaii Housing Dashboard)

As seen in Figure 13, UHERO analysis shows that the County of Maui’s STRs account for 15% of the housing stock. When compared to STRs percentages in other major cities in the country, the County of Maui has at least 6 times more STRs listed. This reveals that a large portion of Maui housing inventory is dedicated to STRs as compared to other major cities in the nation.

The County of Maui has granted 195 and 415 annual permits for STRs and B&Bs respectively. It has also amended the following county ordinance codes to minimize the expansion of STRs:

- 2016 – Amendments
 - Establish a permitting process for STRs.
 - Numbers of permits allowed in each zoning district.
 - Restrictions and standards on STRs.
 - Revocation and enforcement.
- 2021 – Amendments
 - Limited permits for STRs.
 - Limited permits for B&Bs in 2021.
 - Property tax exemptions for long-term rentals.
- 2022 – Moratorium on New Transient Accommodations

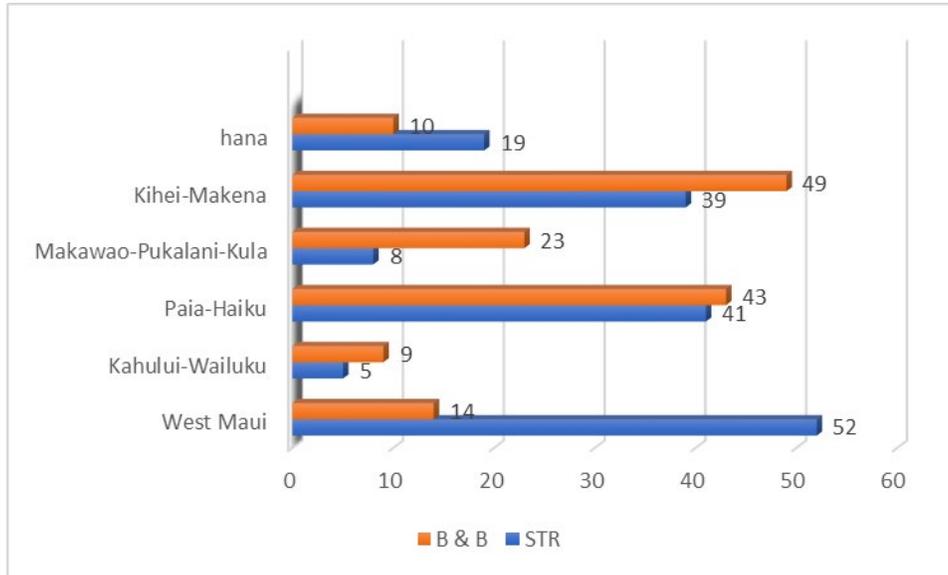
It is estimated that there are at least 7,000 illegal STRs, which could be the reason why the County of Maui also imposed a severe fine in the amount of \$20,000 on property owners that operate a STR without a permit.³² On October 7, 2019, the Mayor of the County of Maui signed a bill amending the county code 19.530.030 to

³¹ *Permitted Short Term Rental (STRH) Homes 9/30/2023*. CP STRH - Short Term Rental Home | Maui County MAPPs, HI. (n.d.). <https://mapps.mauicounty.gov/183/CP-STRH---Short-Term-Rental-Home>

³² Baker, J. (2023, March 13). *Huge fine increase for illegal short-term rentals in Maui County*. LinkedIn. <https://www.linkedin.com/pulse/huge-fine-increase-illegal-short-term-rentals-maui-county-baker>

increase the initial fine for illegal STRs from \$1,000 to \$20,000 and \$1,000 to \$10,000 for per day for STRs and B&Bs respectively.

Figure 13: 2023 The County of Maui Permit Allowed -Short-term Rentals vs B & B



Sources: County of Maui (Planning & Permitting) Permitted B&B and STRH

Additionally, according to Hawaii’s 2019 Housing Planning Study, there were 71,747 housing units on Maui of which 54,387 were occupied. Of the remaining balance of 17,360 vacant housing units, only 8,192 are available to rent because 9,168 units are vacant and unavailable due to vacation, seasonal or occasional use.

Table 26 shows the results of the Housing Demand Study completed on December 30, 2019, by SMS Research for the County of Maui Department of Housing and Human Concerns. It shows the highest number of nonresident owners have properties in the County of Maui and has the second highest total number of properties available for STR at 11,888, compared to the County of Honolulu (Oahu) 37,054. As a result of the significant number of housing units utilized as STRs, an already tight housing market is further exacerbated by the large number of units utilized as STRs.

The County of Maui has established incentives including property tax credits, and special rate on General Exercise taxes and Transient Accommodation to owners of units utilized as STRs that offer long-term leases to residents.

Table 26: Residential Units That Are Rented Out Short--Term

Residential Properties Rented out on a Short-term basis	County				
	Total	Oahu County	Maui County	Hawaii County	Kauai County
Hawai'i Resident Owners (Demand Study)	43,712	31,013	5,091	5,633	1,975
Out of State Owners	21,131	6,042	6,797	3,038	5,255
Total Residential Properties Rented out on a Short-term basis	64,843	37,054	11,888	8,671	7,230

County of Maui (DHHC) Hawaii Housing Planning Study 2019

Sources: The

Potential Recovery Considerations:

- Establish ways to identify, monitor, and track the usage of units for all types of vacation rentals.
- Continue to incentivize owners to utilize their units for long-term rentals instead of vacation rentals.

5) Identify ways to mitigate potential loss from future disasters.

The wildfire in Lahaina spread rapidly from the mountains (mauka) to the ocean (makai). Making improvements that can minimize the spread of fire, avoid flooding, and prevent the loss of life and property should be a priority of all long-term recovery efforts. Widening of the roadways, improving the drainage systems, and building with fire retardant materials can reduce the recovery time and cost of another wildfire and/or flooding disaster. Utilization of mitigation strategies may also save the County of Maui hundreds of millions of dollars, if not billions of dollars, in damages along with decreasing future disaster recovery timeframes. In addition to widening roads, consider also adding or improving multipurpose trails and greenways to be convertible for vehicular use during emergencies – especially for emergency vehicles and evacuation buses.

The frequency of natural disasters is increasing and poses a threat to communities – people and property. Ensuring that the State and County of Maui have the most modern building codes that are hazard resistant can ensure that damages are minimized. FEMA states that one of the best ways to safeguard communities against natural disasters is to adopt and updated hazard-resistant building codes.³³ FEMA has Hazard Mitigation Assistance Grants that could be available for eligible mitigation measures.

Improvement of the storm drainage system will help alleviate the impact of heavy rains and flash floods, which could lead to sinkholes, collapsed roadways and property damage. Fire retardant materials such as Hardi board (cement fibers) used on the exterior of homes will dramatically slow the spread of the fire. The expansion of roadways to reduce congestion and improve traffic flow in the event of community evacuation and provide easier access for emergency response vehicles could also be used as a mitigation strategy. However, this option may require the need to exercise eminent domain over some properties and this could present additional challenges for the recovery efforts. If eminent domain is exercised, having alternative housing options identified, preferably in the same area, could address some of the concerns that might arise.³⁴

The August wildfires left thousands of acres charred in Kula’s Upcountry, which increases the risk of mudslides. With no vegetation cover, heavy rains could wash all the mud downhill and ultimately into the ocean. US Forest Service’s Burned Area Emergency Response (BAER) Team and USDA Nature Resources Conservation Service damage survey team confirmed the urgent need for soil stabilization. About 80 Kula resident survivors formed the nonprofit Kula Community Watershed Alliance to restore, protect, and stabilize the land burned throughout the Kula area.³⁵

³³ FEMA. (2021, September 29). 5 reasons building codes should matter to you. FEMA.gov. <https://www.fema.gov/blog/5-reasons-building-codes-should-matter-you>

³⁴ *Why your community needs better stormwater drainage*. Giving a voice to flood victims to demand change. (n.d.). <https://www.flooddefenders.org/why-your-community-needs-better-stormwater-drainage>

³⁵ *Kula Community Watershed Alliance takes action to restore burned lands, prevent erosion: Maui now*. | Kula Community Watershed Alliance takes action to restore burned lands, prevent erosion. (n.d.). <https://mauinow.com/2023/10/21/kula-community-watershed-alliance-takes-action-to-restore-burned-lands-prevent-erosion/>

Potential Recovery Considerations:

- Ensure new infrastructure includes widening the roadways and/or vehicular use of multi-purpose trails to improve evacuation traffic flow and create greater accessibility especially for emergency response vehicles.
- Minimize flooding, especially flash floods by improving storm drainage system to allow for alternative use of the drain water.
- Ensure the use of fire-retardant materials are included in the rebuilding process for homes and businesses.
- Consider spacing vegetation away from structures to eliminate dried plant material becoming fire fuel near homes.
- Stabilize burn area to prevent erosion and potential mudslides.
- Utilize tax credit incentives to encourage mitigation efforts to be included in all long-term recovery planning/projects.
- Consider adopting or approving building codes that can improve building codes that can reduce property damage and protect lives.

6) Provide incentives for employers to build or to subsidize workforce housing

The County of Maui has a strong tourist industry, which has had a direct impact on the housing inventory. With a large portion of the housing market focusing on STRs, transient vacation, and bed & breakfast rentals, there is limited permanent affordable housing for the workforce. The pre-disaster demand for affordable housing for workers in the hospitality, tourism, agriculture, and educational industries plus the potential influx of long-term recovery workers, including immigrant and migrant workers, particularly in the construction industries will exacerbate the need for workforce housing. This surge along with the increased demand for workforce housing for existing workers will put more strain on the limited rental market, especially affordable housing units.³⁶ With the increase in demand for workers that will be needed to rebuild back Lahaina as quickly as possible, many workers in the construction and restoration industries could journey to the island of Maui.

The State of Hawaii does have a limited inventory of workforce housing for teachers working in rural areas in Hawaii County and the County of Maui. Currently, there are approximately 55 rental units that are available for teachers in these areas. The units are 20 to 50 years old and are 90% occupied with the remaining units needing repairs to make them ready to be rented. With teacher salaries starting around \$50,000 and the cost of rental units in Hawaii being high, it is difficult to recruit teachers due to housing affordability and the high cost of living. There is a need for more workforce housing in all the counties in Hawaii to support workers in the education profession as well as other workers in the agriculture, hospitality, and tourism industries with salaries at or below \$50,000. The governor is working to get legislation passed to support the development of more workforce housing throughout the state.³⁷

³⁶ Stillman, S. (2021, November 1). The migrant workers who follow climate disasters. *The New Yorker*.

<https://www.newyorker.com/magazine/2021/11/08/the-migrant-workers-who-follow-climate-disasters>

³⁷ Ordonio, C. (2023, March 21). *Teacher housing has only been in rural areas, but that could change*. Honolulu Civil Beat.

<https://www.civilbeat.org/2023/03/teacher-housing-has-only-been-available-in-rural-areas-but-that-could-be-about-to-change/>

Table 27: Hawaii DOE Workforce Housing Inventory

Maui District	# Units	% Occupancy	Description
Hana*	10	80%	4-Studios, 6-3 BDRM
Lanai*	12	90%	4-3 BDRM, 6-2 BDRM, 1-1 BDRM
Molokai*	8	100%	2-3 BDRM, 6-2BDRM

Sources: (DOE/February 2023)

HHFDC purchased Hale ‘O Lā‘ie (formerly Hoggai) in February 2024, 175 furnished guestrooms for temporary housing located in Kihei and will operate the facility as temporary housing for wildfire disaster survivors deemed ineligible for reimbursement by FEMA. The project will be managed by Paramount Hotels LLC (Paramount), who own and manage the nearby Maui Coast Hotel.

The property will eventually be redeveloped as a teacher and workforce rental housing project with public pre-kindergarten classroom space. It is estimated that the property can accommodate a total of 350 to 450 individuals.

From 2006 to 2014, Maui County had a 50% inclusionary zoning requirement which stalled new development during that period. There are many challenges to development on Maui including lack of infrastructure and strong community opposition, even to affordable housing projects.

Potential Recovery Considerations:

- Consider offering incentives to businesses that provide affordable workforce housing for their employees.
- Work with existing employers to explore how they can assist in increasing the number of affordable work force housing units.
- Review existing policies on developer requirements to build affordable housing units and consider increasing the percentage of units that must be affordable especially for work force housing developments.
- Establish trades training programs targeting current residents to minimize the need to bring in off-island residents who will further strain the existing housing stock.

Concluding Remarks

On August 8th, the island of Maui suffered catastrophic damage with little warning to the communities of these fast-moving wildfires. The wildfires killed to date 102 people and destroyed the historic Town of Lahaina and severely damaged areas in the Upcountry. These wildfires are the deadliest in the United States in more than a century, surpassing California's 2018 Camp Fire event.

The County of Maui in collaboration with the State of Hawaii is responsible for managing the recovery efforts and rebuilding Lahaina and the Upcountry in an effective and culturally sensitive manner. The rebuilding efforts will be challenged by a single port (Kahului Harbor), limited skilled and licensed workforce, limited equipment, and a susceptible coastline. In addition, the County of Maui must deal with their own capacity issues, including a heavy workload and having to address complex housing issues and housing related infrastructure challenges.

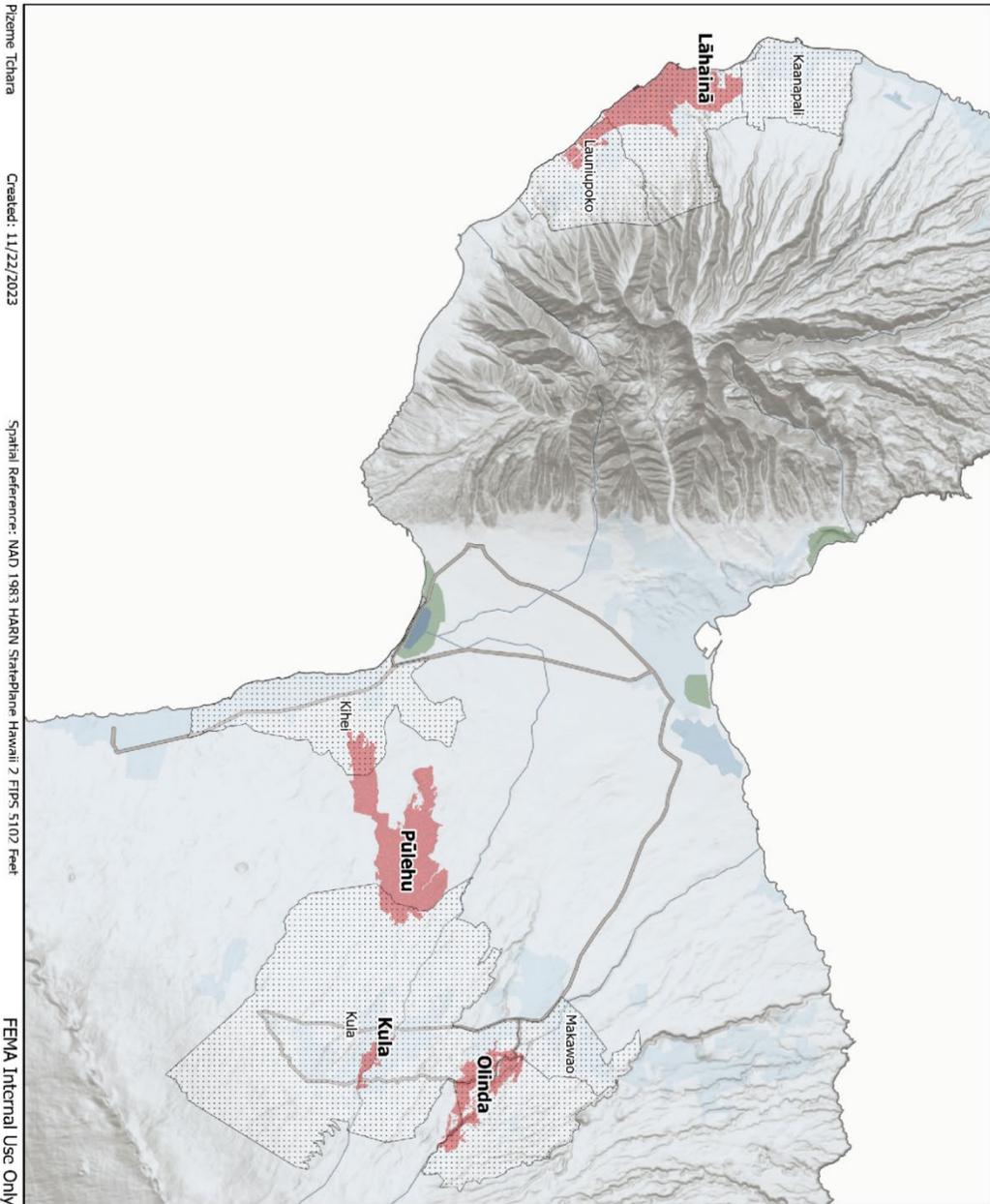
The recovery efforts will take time and will be most successful if it evolves from a robust, comprehensive planning process that promotes community/stakeholder engagement. The County of Maui through its Planning Department has experience in developing community plans and in engaging a wide variety of stakeholders such as the State's Department of Business, Economic Development and Tourism, responsible for state planning and sustainable development, in the planning process (e.g. 2022 West Maui Community Plan).

The rebuilding of the impacted communities will not be easy, but the County of Maui and the various community stakeholders will need to persevere in the planning and rebuilding efforts and addressing the challenges and issues.

This document and the included data should serve as a basis for the County of Maui's long term housing recovery planning and expedite the potential use of Community Development Block Grant Disaster Recovery (CDBG-DR) funding. We anticipate that information in this document will enable the County to develop long term housing recovery plans; design housing programs; address survivor needs based on data evidence, stakeholder engagement, culturally sensitive and special needs considerations; and overall resilient community rebuilding efforts.

Appendix 1 – Housing Post-Disaster Residential Structures

FEMA-DR-4724-HI | Wildfires Maui County - Fire Perimeters

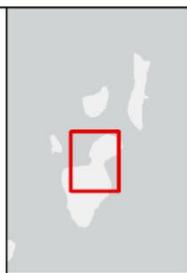


Pizeme Tchana

Created: 11/22/2023

Spatial Reference: NAD 1983 HARN StatePlane Hawaii 2 FIPS 5102 Feet

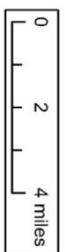
FEMA Internal Use Only



Map Description: The display shows the wildfire burn scars in Maui County, Hawaii.

Data Sources: Maui County GIS, Oak Ridge National Laboratory (ORNL); Federal Emergency Management Agency (FEMA) Geospatial Response Office.

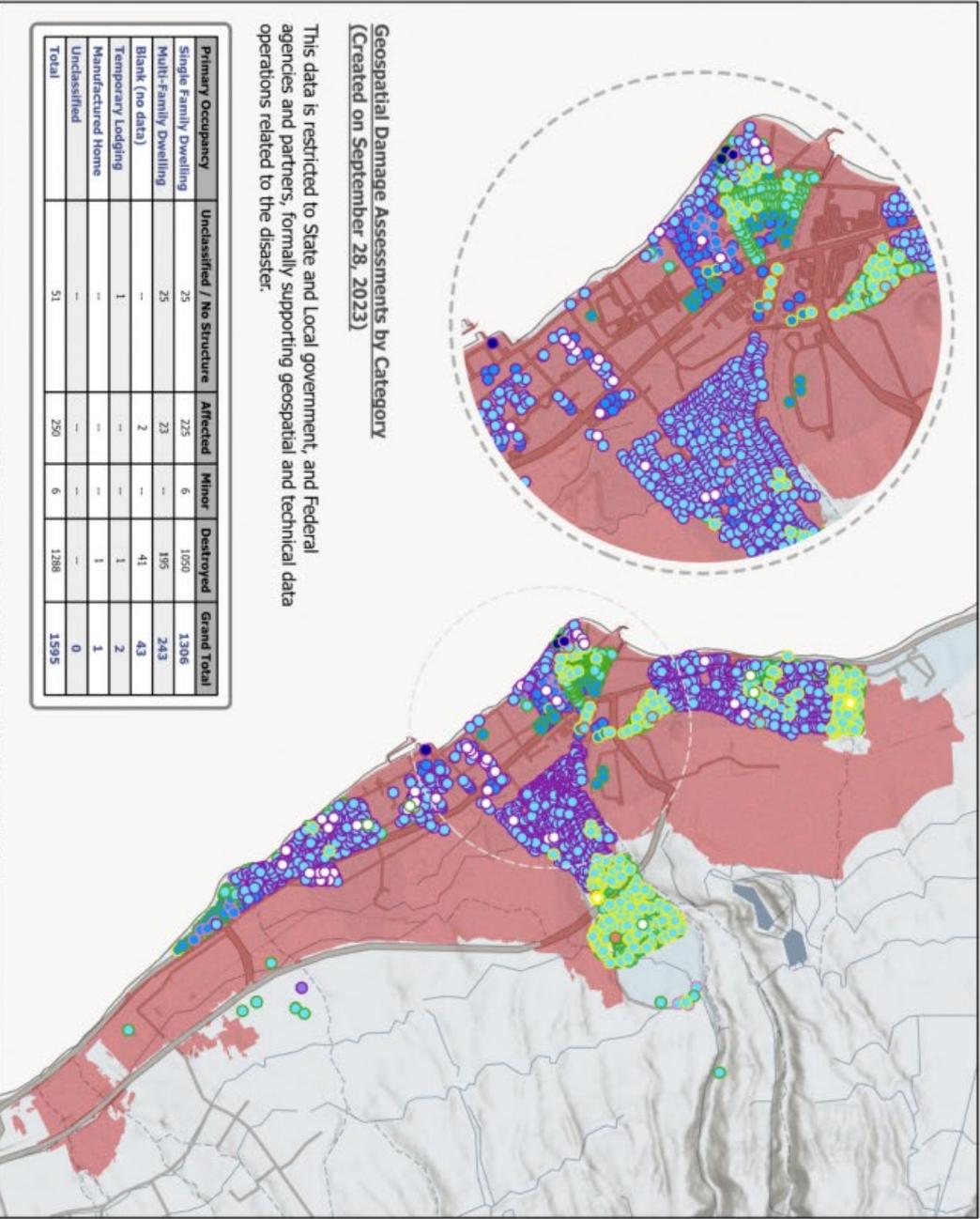
- Burn Scar
- Places



Map #: DR4724-FI-3

FEMA-DR-4724-HI | Wildfires

Lāhainā Wildfire - Impacted Residential Structures



Geospatial Damage Assessments by Category
(Created on September 28, 2023)

This data is restricted to State and Local government, and Federal agencies and partners, formally supporting geospatial and technical data operations related to the disaster.

Primary Occupancy	Unclassified / No Structure	Affected	Minor	Destroyed	Grand Total
Single Family Dwelling	25	225	6	1099	1306
Multi-Family Dwelling	25	23	--	195	243
Blank (no data)	--	2	--	41	43
Temporary Lodging	1	--	--	1	2
Manufactured Home	--	--	--	1	1
Unclassified	--	--	--	--	0
Total	51	250	6	1288	1595

Map Description: The display shows the wildfire burn scars in Lāhainā and damage assessment of residences based on post incident imagery.

Data Sources: Maui County GIS, Oak Ridge National Laboratory (ORNL); Federal Emergency Management Agency (FEMA) Geospatial Response Office.

Primary Occupancy

- Single Family Dwelling
- Multi-Family Dwelling
- Blank (no data)
- Temporary Lodging
- Manufactured Home
- Unclassified

Damage Category

- Destroyed
- Minor
- Affected
- No Visible Damage
- Unclassified / No Structure

Burn Scar
Lāhainā burn area estimate in Acres: 2101.12

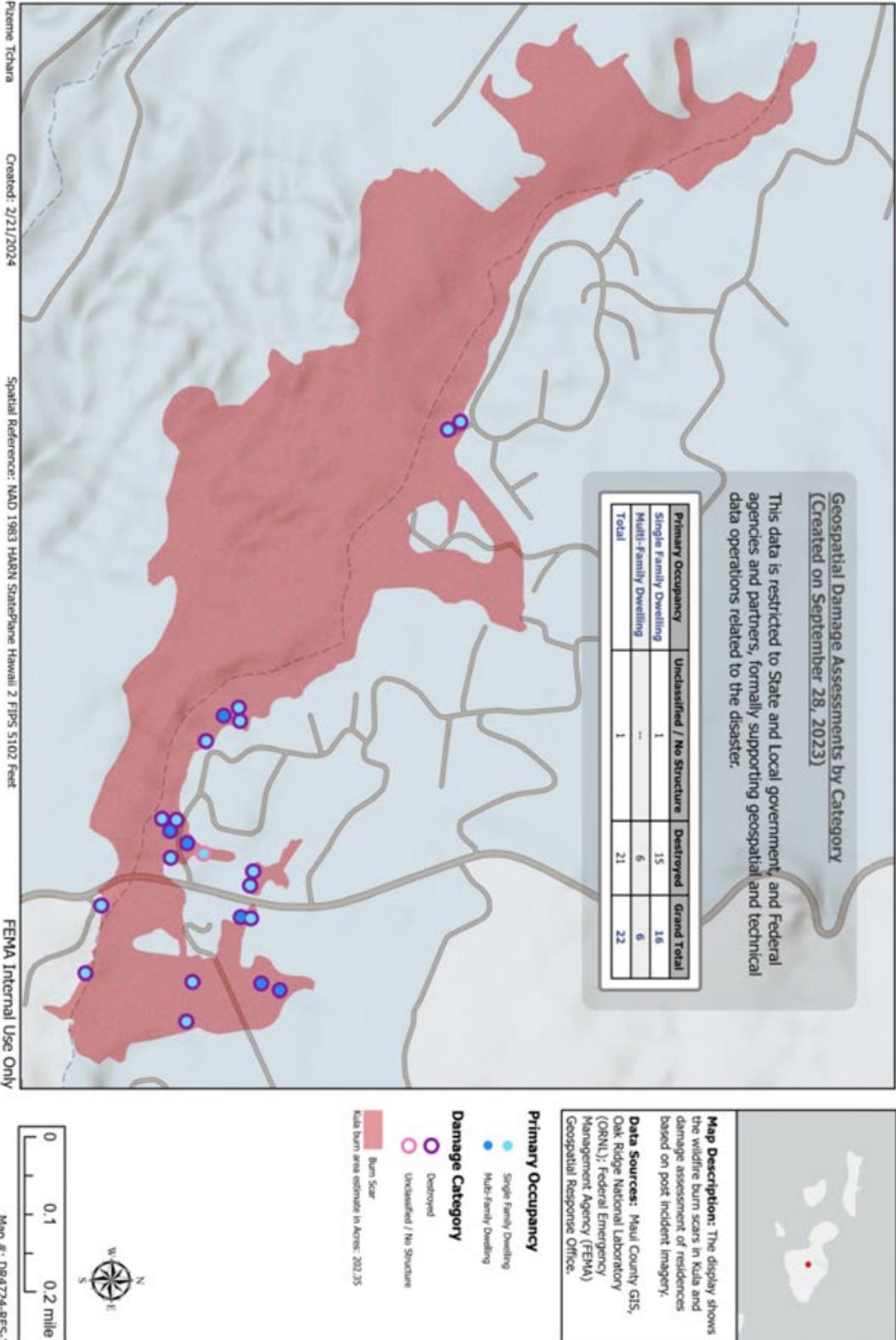
Scale: 0, 0.4, 0.8 mile

Map #: DR4724-RES-1

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FEMA-DR-4724-HI | Wildfires

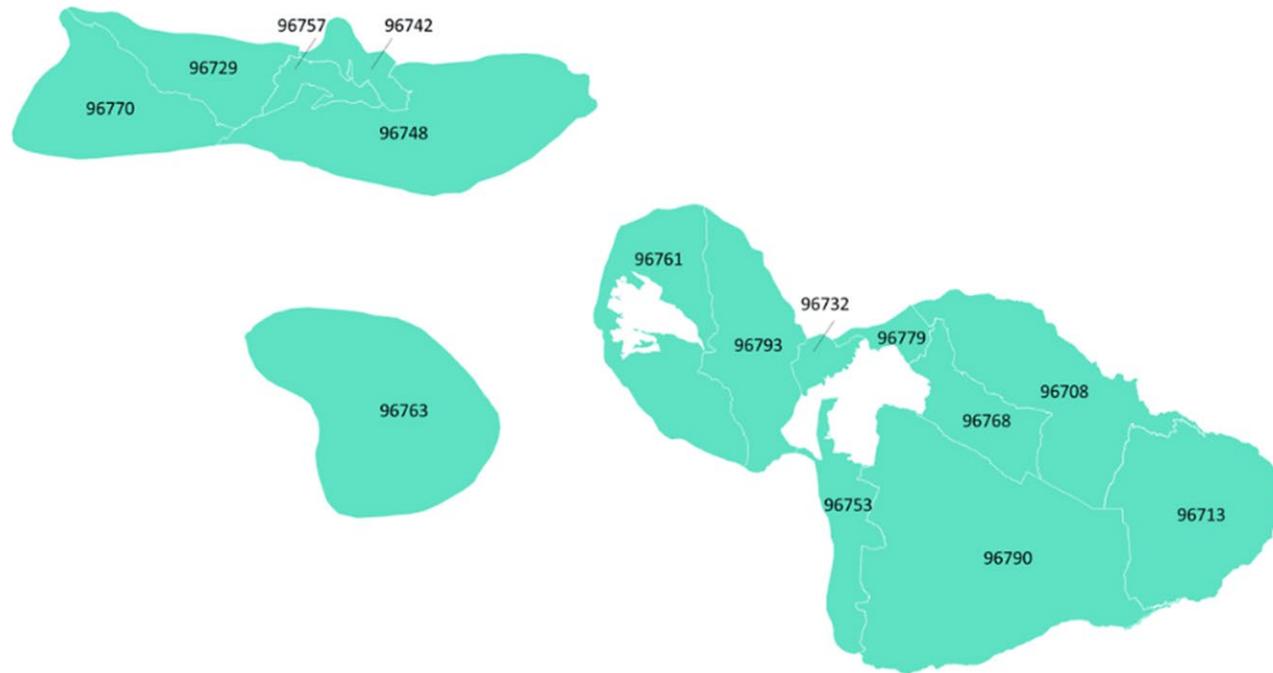
Kula Wildfire - Impacted Residential Structures



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Appendix 2 – County of Maui Map with Zip Codes

Maui & Kalawao County Zip Code Map



Appendix 3 – Reference

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Appendix 4 – Potential Recovery Resources

- [Increasing the Supply of Affordable Housing Toolkit](#)
- [2023 Climate Resources Housing Supply Framework](#)
- [Explore the Funding Navigator](#) This tool is a user-friendly searchable database for IRA, BIL, and other resources. Check out funding opportunities across federal agencies to support climate resiliency, energy efficiency, renewable energy integration, healthy housing, workforce development and environmental justice in HUD supported communities, programs, and properties.
- [A town re-emerges from the ashes of a devastating wildfire. But five years on, is Paradise for all?](#)
- [HOUSING ACTION PLAN Hawaii State Legislature](#)
- <https://library.nclc.org/twelve-tips-homeowners-after-natural-disasters>

Appendix 5 – Success Stories and Best Practices

Maui County CDBG Completed Projects

2019

- Funded the rehabilitation and the removal of asbestos within 12 units at Lahaina Surf. The Hawaii Inspection Group (HIG) performed a survey of building materials used and identified asbestos to be in the popcorn ceilings, joint compounds, and mastic flooring. The 110 units at Lahaina Surf Apartments were built in 1972. The removal of the asbestos materials will create a safe environment for seniors and families.

2017

- Ka Hale A Ke Ola Homeless Centers, Inc. KHAKO Renewal Project Phase II - Partial Funding was used for the rehabilitation of two residential buildings, building 5 and building 6. The KHAKO Renewal Project is a multi-phase plan developed by Cooper and Cooper Real Estate Solutions to accomplish necessary updates, replacements, and improvements to ensure long term operational viability and protect the health and safety of residents and staff.
- Hale Mahaolu Ewalu Senior Center Funding was used for the construction of a senior center within a senior community campus which includes affordable housing for the elderly.



FEMA

July 30, 2024

The Honorable Josh Green
Governor, State of Hawai'i
Executive Chambers
State Capitol
415 South Beretania Street
Honolulu, Hawai'i 96813

RE: Lahaina Wildfire Study: Impacts of Post-Disaster Housing Programs on Maui's Economy

Dear Governor Green:

I am pleased to share the final edition of the *Lahaina Wildfire Study: Impacts of Post-Disaster Housing Programs on Maui's Economy*. This study is the culmination of months of research, engagement, and synthesis to help FEMA understand the complex and nuanced circumstances of Maui's housing market following the August 2023 wildfires. It is an in-depth study, and it benefited greatly from your engagement and from your team's feedback. The purpose of this letter is to share the final study with you, and to outline how the research team addressed the feedback we received.

In addition to the input received from over 30 organizations to conduct the study, Argonne received feedback on the advance study from you, Mayor Bissen, the University of Hawaii Economic Research Organization (UHERO), the Department of Housing and Urban Development (HUD), and Hawaii's congressional delegation. This feedback helped Argonne clarify several nuanced points and ensure that adequate technical detail was provided to support their modeling approach. Major points of feedback included:

- *Causation of rent increases*. Several points of feedback related to Argonne's supply and demand modeling, the impacts of direct lease on long-term rents, and fact that much of the housing that was destroyed was affordable housing. In the final study, the finding related to rent increases is now separated into two findings to enable more nuanced discussion.
 - The first finding relates to the fact that rents have increased and includes more discussion around Argonne's methodology to characterize rent increases.
 - The second finding relates to causes of those rent increases and includes additional information about Argonne's supply and demand modeling, a discussion of the impacts of the loss of *affordable* housing, and additional discussion on the nature of

possible rent increases due to direct lease in the context of lost supply.

- *Market permeability.* Some feedback related to the phenomenon of long-term rental units entering the short-term market. Argonne updated the study to include clarification of what is known based on available information, as well as new-to-FEMA information provided by the County in their review of the study related to short- and long-term rentals participating in Direct Lease.
- *Technical documentation.* Several organizations requested additional technical information about Argonne's modeling, which has been added to the final study along with more information about limitations of Argonne's models. In addition, Argonne will continue to work with UHERO to share and replicate modeling and analysis approaches to inform future efforts. Technical documentation is available upon request.
- *Clarification of statistics and sources.* Several statistics and sources have been clarified in the document. In instances where Argonne included statistics that also appear in HUD's Housing Impact Assessment, Argonne either aligned statistics or explained the difference between numbers. For example, in certain instances Argonne's numbers are based on affected census tracts while HUD's numbers are statewide.
- *Additional considerations for future modeling and evaluation.* Several organizations offered ideas or feedback to enhance or expand Argonne's modeling efforts. Although those ideas were not included in the final study, Argonne will continue to refine models based on this input as part of FEMA's ongoing monitoring and evaluation of housing in Maui.

Argonne also updated disaster statistics and made additional language edits based on feedback or for clarity.

I value our partnership and the discussions we have had about the study, and our work does not end here. Thank you for taking the time to review the study and engage with us, and I look forward to our continued partnership.

Mahalo,



Robert J. Fenton
Regional Administrator
Federal Emergency Management Agency Region 9

CC: James DS. Barros, Administrator, Hawai'i Emergency Management Agency
Luke Meyers, State Disaster Recovery Coordinator, Office of the Governor
Deanne Criswell, Administrator, FEMA
Keith Turi, Acting Associate Administrator, Office of Response and Recovery, FEMA
Justin Knighten, Associate Administrator, Office of External Affairs, FEMA



FEMA

July 2024

The people of Hawaii have been through an unimaginable tragedy. The historic wildfires that swept through West Maui in August 2023 devastated communities and destroyed thousands of homes, businesses, and cultural heritage sites. Almost one year later, the aftermath of this disaster continues to impact their way of life. Together with our state, local, and non-profit partners, we are committed to ensuring the people of Maui have a safe, clean, and affordable housing solution to jumpstart their recovery.

As we approach the next phase of the Maui housing mission, I commissioned a first-of-its-kind study to inform key decisions we, along with our partners, must make to keep recovery moving forward. After collecting and analyzing input from a wide range of local stakeholders and other experts, the study provides us with a shared understanding of needs, roles, and outcomes to leverage a whole of community recovery effort.

We will use these findings to help us deliver on our promise of helping people jumpstart their recovery. The results of the study are an important tool for everyone involved in Maui's recovery, from FEMA and our partners to the people of Maui. I am confident that the study will help inform our decision-making as we strive to enhance long-term recovery outcomes while preserving Maui's history and culture.

FEMA is committed to working with Maui residents to understand how their current challenges have a direct effect on their ability to heal, recover, and rebuild. As Maui continues on the road to recovery, we will remain a steadfast partner to this community for as long as it takes. We will keep collaborating with the state and local government, our federal partners, and nonprofits to ensure our approach carefully considers every aspect of recovery. And together, we will work tirelessly to build a more resilient Maui for generations to come.

Mahalo nui loa,

A handwritten signature in black ink that reads "Deanne Criswell".

Deanne Criswell
Administrator

JULY 2024



Lahaina Wildfire Study: Impacts of Post-Disaster Housing Programs on Maui's Economy

Maui County, HI

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Context

- In August 2023, wildfires destroyed more than 4,000 housing units in Maui County, Hawai‘i, primarily in the town of Lahaina. One hundred and two people were killed, making it the deadliest wildfire in the United States in more than a century.¹ The fire displaced 13,000 people; 5,000 found new housing without government assistance, and 8,000 applied for assistance.²
- Federal, state, local, and not-for-profit entities quickly implemented several housing assistance programs amid uniquely complex cultural, geographic, and socio-economic factors. The state requested direct housing assistance, which FEMA approved based on the information available at the time. Direct Lease was identified as the form of Direct Temporary Housing Assistance that would best meet survivor needs in the community. In Direct Lease, FEMA enters into lease agreements with property owners on behalf of disaster survivors.
 - Hawai‘i’s remoteness limited the feasibility of using Temporary Transportable Housing Units and the already constrained long-term rental market limited the utility of Continued Temporary Housing Assistance, where FEMA provides financial assistance to disaster survivors for market-rate rentals.
 - FEMA targeted short-term rentals for Direct Lease due to their abundance and availability, as demonstrated through high short-term rental vacancy rates on Maui. Additionally, FEMA assumed that the short-term and long-term rental markets were not intertwined so leasing short-term rentals would limit inflationary pressures from Direct Lease in the long-term rental market.

Study Background and Methodology

- Shortly after Direct Lease started, concerns emerged from state and local officials that Direct Lease was causing long-term rents to increase to a point of unaffordability for disaster survivors and other residents. Officials were also concerned that the Direct Lease could cause a decrease in tourism by displacing visitors who normally stay in short-term rentals and could cause an increase in evictions by landlords seeking higher rents paid for by FEMA. As a result of these concerns, in February 2024, FEMA requested that Argonne National Laboratory (Argonne) conduct this study to better understand how temporary housing assistance programs were impacting Maui’s economy to inform FEMA’s approach to housing assistance moving forward.
- The research objectives of the study were to do the following:
 - Evaluate the impacts of post-disaster housing programs, including FEMA’s housing assistance, on Maui’s economy. This necessitated an understanding of both the pre-disaster housing context—including the housing emergency, regulation of short- and long-term rentals, and tourism—and the post-disaster housing situation.
 - Examine the tradeoffs between FEMA Direct Lease and building alternative housing units, including time, cost, economic, environmental, and cultural factors.
 - Evaluate the timing and interaction of housing assistance activities, including assessing gaps between shelter, temporary housing, and long-term housing efforts and assessing FEMA’s role in addressing Maui’s long-term affordable housing challenges.

- Argonne interviewed representatives from more than 30 federal, state, and local government and non-profit organizations to gather information on the pre-fire conditions in Lahaina and the impacts of the fire. Argonne performed additional desktop research to build on the information gathered through interviews including policies and regulations affecting local housing, environmental and historic preservation issues, and the delivery of post-disaster assistance.
- Argonne combined the interview and desktop research data with quantitative data from multiple sources including the U.S. Census Bureau (Census); Bureau of Labor Statistics; the State of Hawai‘i Department of Business, Economic Development and Tourism (DBEDT); Maui County; and the University of Hawai‘i’s Economic Research Organization (UHERO). Argonne used multiple modeling techniques, including supply-demand modeling and simulations of recovery and rebuilding timelines to evaluate changes in the Maui rental market, reconstruction durations, and timelines for long-term rental market stabilization following the fire.
- After the initial round of interviews, Argonne researchers identified several factors that affect how people viewed the success of the recovery efforts:
 - West Maui is generally considered a distinct and somewhat self-contained geographic location. Commuting to West Maui from other parts of Maui is challenging, so many people both live and work in West Maui. Being a West Maui resident is an important part of people’s identity. In addition, Lahaina was one of the few areas in Maui County where working-class people could afford to live near the water.
 - Stakeholders have different definitions of what successful recovery should be (e.g., Native Hawaiian cultural sites are restored; Lahaina grows as a tourism destination; the state-wide housing crisis is solved; or people who want to move back to Lahaina can do so). The definitions are not mutually exclusive but also are not fully aligned.
 - The term “temporary” has a different meaning depending on the stakeholder. In typical housing operations, FEMA approves its temporary housing program on an 18-month timeline with the option to extend in 6-month increments. However, Maui County and the State of Hawai‘i spoke of temporary solutions in terms of several years. FEMA has acknowledged the longer-than typical timeframe and is adjusting its timeframes accordingly. FEMA, the state of Hawai‘i, and Maui County officials are coordinating to align program timelines with unified housing goals but it is important to understand how the same word can have different meaning depending on the user’s perspective.
- Argonne provided an advanced draft copy of this report to state, local, and other stakeholders. As feasible, comments were addressed prior to finishing this report.

Geographic Focus

- This report includes a wide variety of data sources from federal, state, local, and non-governmental sources. As feasible, Argonne sought to include data down to the census tract level for the three most affected census tracts, shown in Figure 1. Where necessary due to data constraints, Argonne provided information at the county level.
- The Census provides demographic data in a wide variety of geographic extents (e.g., state, county, place, zip code, tract, block). In some cases, these geographic extents overlap (such as tracts and zip codes), meaning that numbers may appear slightly different depending on the level of analysis. To meet the research objectives of this report, Argonne elected to analyze demographics using the 2022 American Community Survey 5-year estimates at the tract level. Unless otherwise noted, demographic statistics throughout this report are from the 2022 American Community Survey at the tract level.
 - The U.S. Department of Housing and Urban Development (HUD) and other stakeholders have used similar data, but at different geographic extents. As a result, statistics may vary.

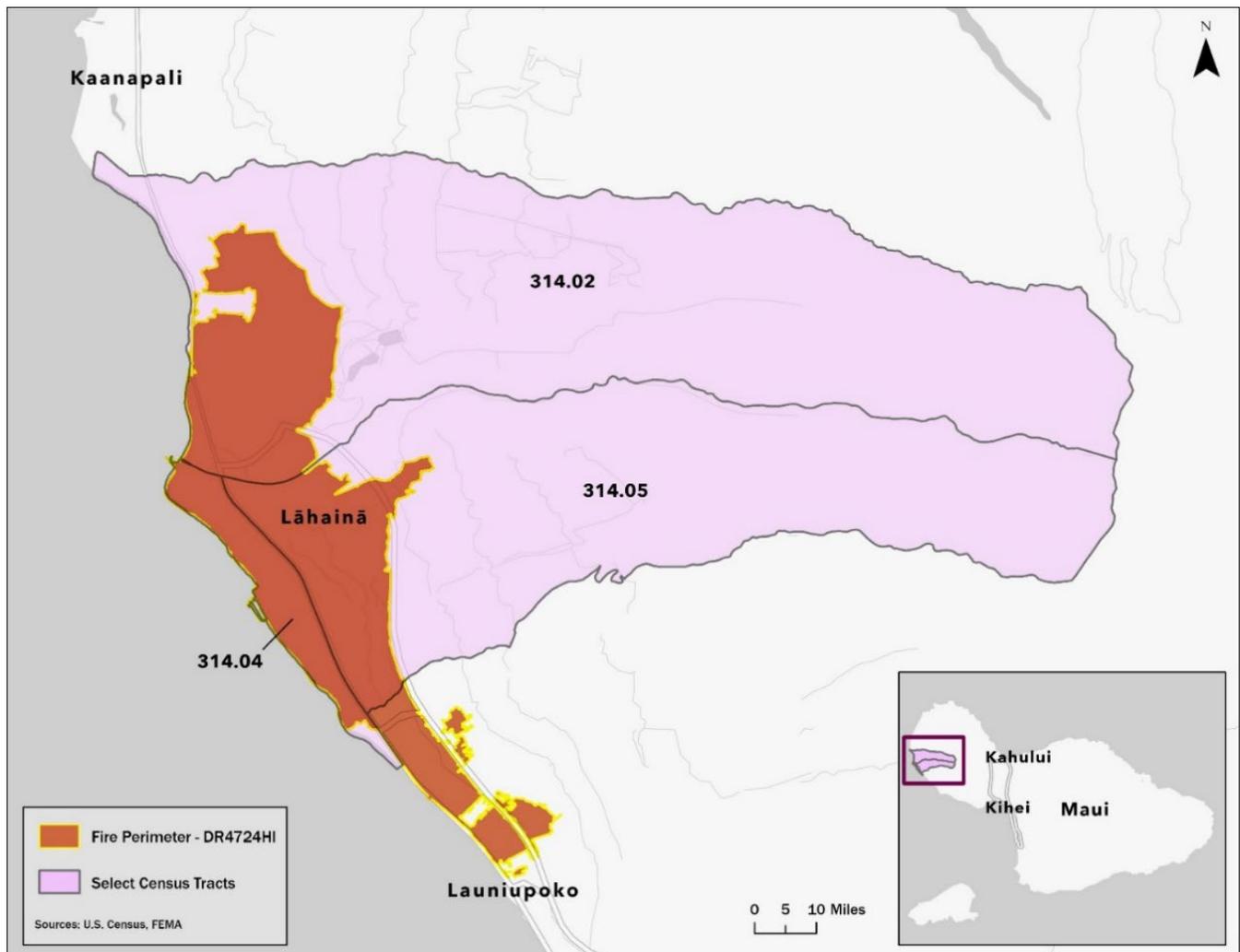


Figure 1: Most Affected Census Tracts

Demographics

- **People:** About 7% of Maui County’s population lived in the three census tracts most heavily impacted by the wildfire. Table 1 presents key demographics of these three tracts compared to the county and nation.
- **Income:** The per capita income in these tracts is 13% to 24% lower than the county and national per capita incomes indicating this was an area where residents may have struggled economically.
- **Household Size:** Within the affected area, 25% of the households were multi-generational households, compared to 9% statewide and 5.5% nationally.³ Larger households were also common.
 - Interviewees spoke of overcrowding and/or doubling up both because of lack of affordable housing options and because of the [cultural preferences](#) of Native Hawaiians and of Southeast Asian and Central American immigrants.
- **Citizenship:** Many of the people living in the affected area were foreign-born; almost half of the foreign-born population were not U.S. citizens and therefore not eligible for FEMA assistance. More than 20% of people also identified as having Native Hawaiian heritage.

Table 1: Demographics for Maui County in 2022⁴

DEMOGRAPHIC	TRACT 314.02	TRACT 314.04	TRACT 314.05	MAUI COUNTY	USA
Total Population	3,208	3,223	6,280	164,754	333M
Percentage of Households With One or More People Under 18 years	34.9%	39.8%	48.1%	33.3%	31.4%
Percentage of Households With One or More People Over 60 Years	40.4%	36.0%	50.2%	48.1%	38.7%
Percentage of Householder Living Alone and 65 Years or Older	3.5%	10.5%	5.3%	9.4%	10.7%
Percent of Households where English is Spoken Less Than “Very Well” ⁵	16.5%	10.7%	25.5%	9.4%	8.2%
Percent of Population Native Hawaiian and Pacific Islander Alone ⁶	14.9%	9.2%	8.7%	12.1%	0.2%
Percent of Population that is Foreign-born	26%	21%	44%	17%	14%
Percent of Foreign-born Residents that are U.S. Citizens	44.9%	53.8%	54.7%	60.8%	52.3%
Percent of Foreign-born Residents from Philippines ⁷	43%	29%	69%	56%	4%
Percent of Foreign-born Residents from Mexico	11%	18%	8%	4%	24%
Percent of Foreign-born Residents from Oceania not elsewhere classified (i.e., Fiji, Marshall Islands, Micronesia)	27%	2%	2%	4%	0%
Per Capita Income in the Past 12 Months ⁸	\$35,974	\$32,700	\$34,826	\$42,607	\$41,261

Housing

- **Pre-Existing Conditions:** Housing supply and affordability were both issues in Maui County before the fire, with an estimated 10,400 units, including 5,000 affordable housing units, needed to meet demand.⁹ These issues were not isolated to Maui County; in July 2023, Governor Green issued an Emergency Proclamation Relating to Housing meant to increase the rate and amount of residential construction throughout the state. The governor issued an additional proclamation following the fire specific to Lahaina.
- **Occupancy:** According to the Census, there were 54,728 occupied housing units in Maui County as of 2022. Of those, 35,758 (65.3%) were owner occupied and 18,970 (34.7%) were renter occupied.¹⁰ Additionally, 17,073 housing units were vacant, of which 6,974 were for rent county-wide.
 - Lahaina’s unique community composition makes it difficult to pinpoint the exact number of housing units that were renter occupied, owner-occupied, or both before the fire. According to the Census, 48% of all occupied housing units in the three most impacted census tracts were renter occupied, and 52% were owner occupied. At the same time, 25% of all households are multi-generational, and it is possible that some of these households would be a combination of owners and renters. Likewise, doubling up and overcrowding were a common occurrence. Finally, 77% of the approximately 4,000 FEMA applicants approved for some type of FEMA assistance were renters. Taken together, it is likely that the actual number of housing units with renters was higher than Census estimates indicate.
- **Housing Costs:** When accounting for renters, owners with a mortgage, and owners without a mortgage, 42% of all households in Lahaina are cost burdened, defined as households who expended more than 30% of their annual income on housing. Table 2 provides additional detail by occupancy type and shows that housing cost burden is generally higher in Lahaina than the national average.¹¹ It is especially acute in tracts 314.02 and 314.04.

Table 2: Cost Burden by Occupancy Type

COST BURDEN BY OCCUPANCY TYPE	TRACT 314.02	TRACT 314.04	TRACT 314.05	MAUI COUNTY	USA
% Cost-Burdened Renters	55.7%	56.7%	49.8%	52.9%	49.9%
% Cost-Burdened Owners with Mortgage	48.0%	54.2%	23.3%	43.7%	27.3%
% Total Cost-Burdened Owners Without a Mortgage	1.6%	33.3%	3.5%	11.3%	13.6%

- Based on data from Zillow, rents rose 28% in the Kahului-Wailuku-Lahaina metropolitan area between April 2021 and July 2023 compared to a national rate of 22.4%.¹² Similarly, rental data from Craigslist collected by UHERO indicates that rents rose 25% in Lahaina as well as Maui County between 2021 and 2023.¹³ Cost burden is likely to increase given the observed increase in rents since the fire.
- **Short-term Rentals:** The number of housing units occupied by long-term renters decreased by 17% between 2017 and 2022.^{14,15,16} More than 10% of housing units in Maui County in 2022 were unavailable to the resident housing market because they were held for seasonal use compared to 3% nationally. Maui County has more than 16,000 units (e.g., apartments, condos, houses) legally eligible to operate as transient vacation or short-term (less than 6 months) rentals without a short-term rental permit.¹⁷ These units generally are in districts zoned for hotel use, but some are in apartment districts or other areas. Unlicensed short-term units

were reported to be prevalent, but the county and state lack definitive data on the number or location of such units; the county has limited capacity and capability to enforce regulations against the conversion of housing units to short-term rental units.

- **Sale Prices:** The residential sales prices reflect the constrained housing supply. The median sales price for a single-family home in Maui County in 2023 was \$1.2 million and \$848,000 for a condominium; the 2023 median sale price is a 126% increase from 2013 and exceeds the national median of \$417,000.¹⁸
- **Cultural Norms:** The importance of *'ohana*, or an idea of family that extends beyond the traditional American nuclear family and implies an obligation and desire to care for one another, was mentioned often by interviewees. Many in Lahaina were part of multi-generational families or other communal households (approximately 25% of households in the affected area). Interviewees also noted that living in West Maui is an important part of many people's identity, and the loss of the ability to live there has had social and mental health implications.
- **Home Modifications:** It was common for single family homes in Lahaina to be modified to include additional bedrooms or Accessory Dwelling Units, also called *Ohanas*. These modifications were typically not permitted or regulated and did not include necessary utility upgrades.

Barriers to Residential Development

- **Regulatory Requirements:** For any development to occur in Maui County, the project must align with several layers of regulation, which include state environmental review, state land-use designations, the countywide policy plan, island plan, community plan, zoning code, and potentially any historical or environmental district overlays. Finding parcels that already have the appropriate alignment of entitlements at all levels is difficult.
- **Permitting Process:** The permitting process is also lengthy, which significantly limits the housing development process. According to Maui County's website, it took an average of 300 days to approve a permit in 2021 and 2022.¹⁹ Factors include resubmittal requests and a decentralized process that involves almost every department in the county government coupled with county capacity constraints.
 - In March 2024, the Maui County Council passed legislation to expedite emergency building permits for alterations, repairs, reconstruction, and new construction of residential structures in disaster affected areas. The resulting changes along with other County efforts have led to an average permitting time of 15 days for housing permits submitted within the burn scar as of July 2024.
- **Water and Wastewater Access:** As part of the entitlement and permitting process, developers must also be able to demonstrate access to a long-term, reliable source of potable water as well as an ability to appropriately dispose of wastewater. The Hawaii Commission on Water Resource Management has jurisdiction over existing and new water use permits in West Maui.
 - Surface water sources, which are particularly vulnerable to drought, supply 65% of water systems in West Maui.²⁰ Most water systems in West Maui are privately owned; the county provides about 24% of the water supply, which limits its ability to plan or instigate new development in most of the region. In addition, the Lahaina Wastewater Reclamation Facility cannot sustain additional development without additional infrastructure.

- **Construction Costs:** Construction costs are also high in Hawai‘i due to site conditions (e.g., volcanic rock requires blasting to grade the site) and higher-than-national average supply and labor costs. Residential construction costs in Honolulu increased 7% to 10% between 2022 and the first quarter of 2024 and range from \$310-\$580/square foot for single family construction to \$275-\$470 for multi-family construction. These costs exceed all major metro areas except for New York, San Francisco, and Chicago.²¹ Interviewees noted the cost to build in Maui County has historically been more expensive than Honolulu. They estimated construction costs to be \$300–\$500/square foot prior to the fire. They noted, however, that some survivors have been quoted as high as \$800–\$1,000/square foot to rebuild after the fire.

Temporary Housing Assistance

- **Fire Impact to Housing:** The State of Hawai‘i estimates that a total of 4,005 housing units and 800–1,100 non-residential structures were destroyed in the fire.²²
 - More than 8,000 survivors were placed in hotels through the state-run Non-Congregate Sheltering effort. More than 4,000 households were approved for assistance through FEMA’s Individuals and Households Program.
 - Eighty percent (80%) of eligible FEMA applicants were renters, which is significantly higher than is typical of FEMA temporary housing operations. This is noteworthy because, unlike property owners, renters do not control the rebuilding of housing they previously occupied. The state and several community-based organizations have also provided housing assistance to more than 500 households affected by the disaster.
- **Debris and Impact to Utilities:** The water, wastewater, and electrical systems were damaged throughout Lahaina. Substantial parts of the systems have been repaired to at least temporary working conditions as of April 2024. Removal of fire-generated debris must be completed before permits can be issued and repair work on public and private property can begin. As of July 2024, approximately 75% of residential parcels have been cleared of debris and released for rebuilding; given the rate of progress, most single-family residential properties are expected to be cleared by the beginning of August 2024. Some HUD-assisted multi-family developments are expected to be cleared in September and October 2024.²³

Direct Lease

- **Decision to Authorize Direct Lease:** FEMA approved a direct temporary housing mission for the Lahaina Fire (DR-4724), including Direct Lease and Multi-family Lease and Repair, on September 13, 2023. Interviewees indicated that the unique nature of the housing market in Maui County, and the concentration of available short-term rentals in West Maui coupled with survivor preference to remain in West Maui, led to Direct Lease being the most feasible and efficient option to meet interim housing needs. Further, based on the high number of apartment-hotels, vacation properties, and timeshares, FEMA and its federal, state, local, and non-profit partners prioritized securing short-term rentals based on the assumption that the short-term rental market and the long-term rental market were not intertwined and, therefore, that securing short-term rentals would not have a significant impact on long-term rental rates. The State of Hawai‘i and Maui County coordinated to implement tax relief measures for property owners who made their units available for Direct Lease.

- **Direct Lease Units Secured:** FEMA secured 1,362 units for the Direct Lease program. Monthly rents were negotiated unit-by-unit and based on what an owner could expect to receive if the unit operated as a short-term vacation rental. FEMA stakeholders noted that FEMA also pays homeowner’s association fees, cleaning fees, and utility fees in addition to monthly rental rates. Of the units secured, approximately 50% are in West Maui in or near Lahaina. The remainder of units are located primarily in central Maui and south Maui.
 - As of July 2024, FEMA has licensed households into 1,217 Direct Lease units.²⁴ FEMA stakeholders indicated that it has taken some time to match available units to survivor households. Matching a unit to a household can be particularly challenging for families requiring larger units, those with pets, and survivors with access and functional needs. In addition, FEMA has deferred heavily to survivor preference, offering as many as four different units to survivors in need of housing. This has meant that some units have necessarily been vacant for weeks or months.
 - For property owners that agreed to participate in programs to house survivors, including Direct Lease, Maui County offered an 18-month tax exemption. Of those receiving the tax exemption, Maui County reported that 370 units were previously non-short term rental units (e.g., previously long-term rentals or owner-occupied homes).²⁵
- **Targeting Short-Term Rentals for Direct Lease:** FEMA undertook communications and outreach efforts targeted towards securing short-term rentals, including hosting multiple industry days with property owners, management companies, and other stakeholders. FEMA also undertook several efforts to prevent long-term rental property owners from unlawfully ending leases in order to participate in the Direct Lease program.
 - For example, in consultation with the State of Hawai‘i and other non-profits, FEMA included messaging in materials and public meetings indicating that property owners who ended long-term leases would not be considered for Direct Lease. In cases where FEMA directly received a complaint about a property, they coordinated with the Attorney General’s Office to investigate and adjudicate the complaint. As of May 2024, there were fewer than 10 cases where FEMA determined that a property owner in the Direct Lease program wrongfully ended a lease. In all cases, FEMA terminated the lease.
 - While FEMA undertook efforts to prevent landlords who wrongly terminated a lease from participating in Direct Lease, anecdotal reports from stakeholders and data from the State of Hawai‘i indicate that some landlord behavior may have changed. In response to the governor’s emergency proclamations related to the fire, the Hawai‘i Office of Consumer Protection established a hotline to provide both tenants and landlords with the opportunity to document complaints related to rent increases, lease terminations, needed repairs, or security deposits. The hotline received 700 complaints by April 2024. The Attorney General’s Office opened 193 cases resulting in 137 investigations. Of those investigations, 79 were found not to be a violation, 25 violations were corrected, and 33 investigations are ongoing as of May 2024.
- **Renter Cost Burden:** As noted earlier, approximately 42% of all households in Lahaina were housing cost burdened before the fire. Further, more than 55% of renters were cost burdened in two of the three most impacted census tracts.
 - Argonne evaluated income for households eligible for or already leased into FEMA Direct Lease units in relationship to current long-term rental rates. Approximately 80% of households were renters pre-fire and

had a median income below the county-wide median income. Argonne found that households in Direct Lease would be severely rent burdened if they did not have access to FEMA assistance.

Alternative Temporary Transportable Housing Units

- **Alternative Temporary Transportable Housing Unit Decision:** FEMA approved the State of Hawai‘i’s request for Alternative Temporary Transportable Housing Units (ATTHUs) as a supplement to Direct Lease on December 8, 2023. FEMA is already constructing a group site north of Lahaina at Kilohana that will support up to 169 ATTHUs. Site preparation activities are underway, and a request for proposal for ATTHUs has been released. The current group site design is intended to accommodate as many units as possible. Kilohana is located on land that is currently owned by the Hawai‘i Housing Finance and Development Corporation and is adjacent to the State of Hawai‘i’s temporary housing site. FEMA is considering additional opportunities to place ATTHUs on private sites or other group sites.
- **State and Non-Profit Programs:** The State of Hawai‘i, Maui County, and multiple non-profit organizations such as Council for Native Hawaiian Advancement and The Family Life Center, have also initiated housing assistance programs intended to support displaced households not eligible for FEMA assistance. The state and Maui County have announced plans to establish the Kala‘iola group site consisting of 450 modular units on land adjacent to FEMA’s planned Kilohana group site. The state anticipates the first 270 units to be available in August 2024. Unit sizes will range from studios to three bedrooms.
- **Site Locations:** Both the Kilohana group site and Kala‘iola group site are located on or adjacent to land that is understood to be intended for transfer to the Department of Hawaiian Home Lands for future use as homesteads for native Hawaiians.

Economy

- **Employment Center:** West Maui has been the center of gravity for the visitor economy in Maui County with many of the hotels, short-term vacation rentals, and tour companies concentrated there. Many of those employed in the visitor economy also lived in West Maui to be close to their jobs. For instance, more than 2,500 people, or approximately 57% of Lahaina’s workforce, were employed in Lahaina or in other parts of West Maui.²⁶
- **Unemployment:** Since the onset of the COVID-19 pandemic, several of Maui County’s visitor-related industries have seen sustained drops in employment (e.g., accommodation sector employment is 16.2% below pre-pandemic levels). The overall unemployment rate for the year before the fire had been low with rates between 2.5% to 3.9% but increased to 8.3% in the month following the fire. This increase was lower than some predictions and has improved in the months since the fire. As of April 2024, the unemployment rate was 4.3% for Maui County.²⁷
- **Tourism Impacts:** Through the end of April 2024, visitor arrivals to Maui were down 35% since the fire compared to the same period the prior year; while the state also experienced a decline in visitors, the decrease was only 3%.²⁸ Visitor spending in Maui County at the end of 2023 appeared to be down about 1.5% points compared to the end of 2022. Maui County’s average year-to-date hotel occupancy rate in May 2024 was 65.4%, or an increase of .22% points compared to the same time period in 2023.²⁹ Maui County’s vacation rental unit year-to-date occupancy rate in May 2024, however, was down by 7.9% points compared to the same period in 2023.³⁰

Findings: Economic Impacts from Housing Programs and Recovery Outlook

- This section describes Argonne’s findings based on the review of pre-fire housing conditions, the impacts to housing from the fire, the federal, state, local and non-governmental housing assistance programs available, time-to-recovery modeling, and supply-demand modeling.

Finding 1: Changes to Rental Costs

- Median rent increased from \$2,500 a month in early 2023 to approximately \$3,600 per month as of June 2024, based on data collected from public sources (Figure 2).
 - To estimate changes in median rent, Argonne used pre-fire data that UHERO collected from Craigslist. For post-fire estimates, Argonne used data that the Council for Native Hawaiian Advancement collected from Craigslist, rent.com, and Trulia in October 2023, December 2023, and February 2024. Additionally, Argonne collected data from Craigslist, rent.com, Trulia, and Apartments.com in April 2024 and June 2024. Argonne cleaned data to remove duplicates (as determined by address, unit number, and other unit characteristics) prior to estimating median rent.
 - Argonne also reviewed Zillow’s Observed Rent Index (ZORI), which measures the mean of listed rents that are within the 35th to 65th percentile of all rental units in a given region.³¹ They estimate that typical rents increased from \$3,331 to \$3,775 over the same time period.
 - The sample size for post-fire observations is small (average n=102 for October 2023 – February 2024, average n=355 for April – June 2024). As such, it is likely that they do not capture the full breadth of the rental market inventory.

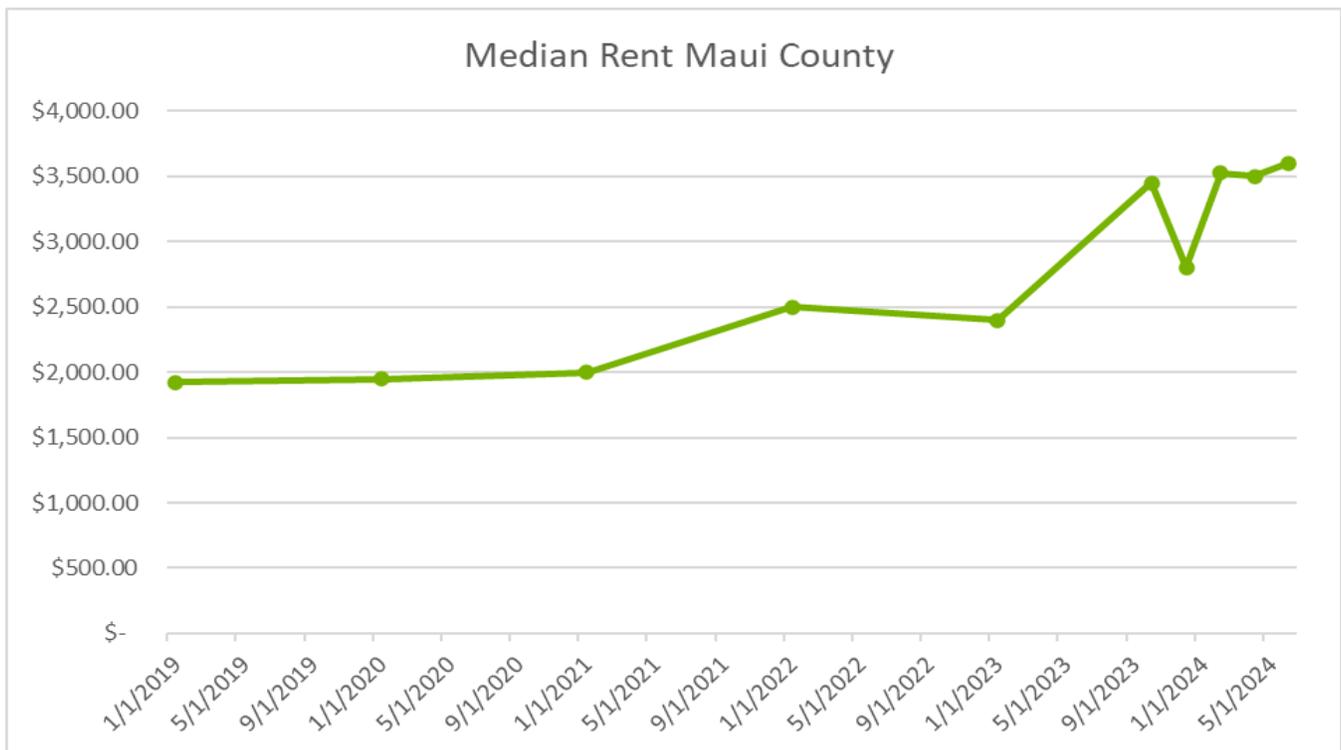


Figure 2: Median Rent from Public Websites³²

- The fire affected an area that was one of the most affordable for renters in Maui County. According to data from the Census, tracts 314.04 and 314.05, where the majority of homes were lost, had pre-fire rents that were 18% and 1% below county-wide averages, respectively.
- The post-fire rent increases, driven by the loss of a significant amount of affordable housing, are intensifying market conditions that triggered a housing emergency before the fire. They are especially acute for fire-affected households that rent. Median household income for families who have qualified for any type of FEMA housing assistance is well below the county average per year, meaning that median rent under current market conditions would result in those households being severely rent burdened and likely unable to afford market-rate rents.³³ As a result, they will likely require housing assistance for a prolonged period.

Finding 2: Loss of Housing Supply Drives Rent Increases

- Argonne assesses that the primary driver of the increase in median rent is the loss of housing supply, especially the loss of a significant amount of affordable rental housing in Lahaina. Argonne could not quantitatively detect specific rental price impacts from FEMA Direct Lease and related state or non-profit efforts to date.
- Using publicly available pre- and post-fire data, listed in Table 3, Argonne developed a supply-demand model (Figure 3) to assess any changes in the county-wide rental market that could have been induced by the influx of assistance, including Direct Lease, as well as similar efforts from state and non-governmental organizations.

Table 3: Model Variables and Data Sources

VARIABLE	DATA SOURCE
Occupied Housing Units	ACS 2022 5-Year Estimates, Table S2501
Renter Occupied Housing Units	ACS 2022 5-Year Estimates, Table S2501
Vacancy Status	ACS 2022 5-Year Estimates, Table B25004
Monthly Rental Costs (pre-fire)	Craigslist (collected by UHERO)
Monthly Rental Costs (post-fire)	Craigslist, realtor.com, Trulia (collected by CNHA and Argonne)

- To estimate demand, Argonne evaluated multiple factors that could both increase and decrease demand. For example, a factor that might increase demand includes homeowners who lost their homes in the fire and are now looking for rental resources. A factor that might decrease demand could include individuals seeking housing off-island. FEMA's data indicates that 49 individuals accepted FEMA assistance to move off-island. Impacts to demand were considered to be relatively small resulting in the assumption in the model that demand for rental units was the same pre -and post-fire. Factors of demand continue to warrant further monitoring.
- With a consistent level of demand, as supply of rental units in the market decreases, the equilibrium cost increases.
- To estimate supply post-fire, Argonne applied a linear regression that used the percentage of renter-occupied housing units and the long-term rental vacancy percentage rate as independent variables to predict median monthly rent cost. Because post-fire renter occupancy and vacancy data is not yet available from the Census, Argonne imputed those rates based on the estimated number of rental occupied housing units lost in the fire.

- Argonne performed a series of tests to inform both supply and demand side elasticity, or a measure of how responsive an economic variable is to change. These tests were used to validate results from the regression of vacancy and rental share in the supply demand model.
- Demand side elasticity measured the sensitivity of renters on the island to make the choice to rent a unit or make another housing decision (e.g., move in with family members, move off island), as a function of income and renter share of the housing market over time.
- Supply side elasticity measured the sensitivity of property owners to make the choice to offer their property as a long-term rental unit or offer it as another type of housing (e.g. short-term rental, leave vacant), as a function of vacant units in the market related to units used as long-term rentals. Argonne also evaluated the pricing of short-term rentals versus long-term rentals over time to contextualize landlord behavior (supply side elasticity) in pricing long term rental units.
- Model results are presented in Figure 3. For the model, Argonne used a lower bound of 48% of destroyed housing units that were renter occupied, consistent with Census estimates of renter-occupied housing units in the three most impacted census tracts. Argonne used an upper bound of 70% of destroyed housing units that were renter-occupied based on the recognition that some housing units in Lahaina were a mix of owner and renter-occupied. The shaded area on the chart represents the range of potential rental price increases based on the supply shock from the fire.

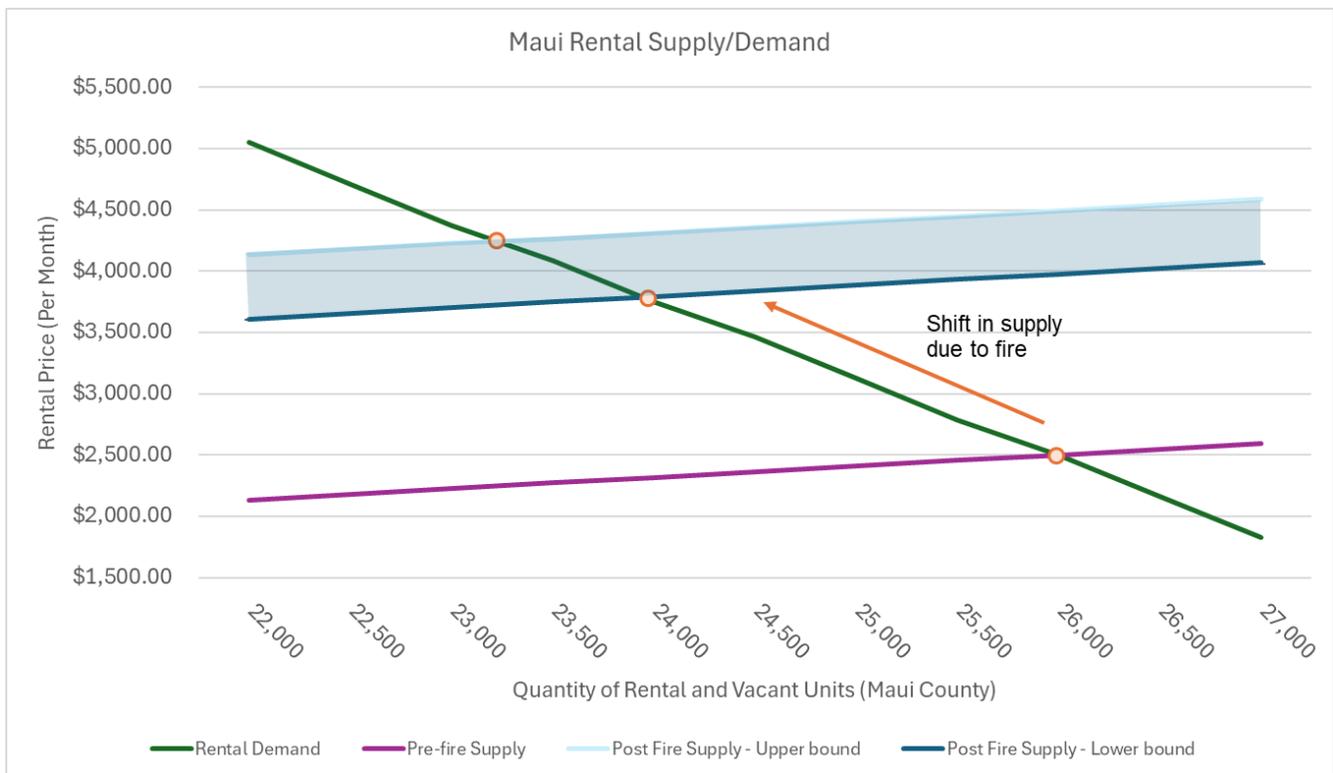


Figure 3: Rent Supply-Demand Model Results

- As previously noted, Census data indicates that there were approximately 18,970 renter occupied units in Maui County and an additional estimated 6,974 units for rent. If 48% of the 4,005 housing units lost in the fire were renter occupied, county-wide rental unit supply decreased by approximately 1,900 units, or

7% of total rental housing in Maui County. Under those conditions, the supply-demand model results indicate that county-wide median rent could increase to as much as \$3,800 per month.

- If 65% of the units lost in the fire were renter occupied, that would mean that approximately 2,600 units, or 10% of long-term rental housing in Maui County was lost in the fire. Under those conditions, the supply-demand model indicates that county-wide median rent could increase to as much as \$4,400 a month.
- As previously mentioned, median rent increased from \$2,500 a month in early 2023 to approximately \$3,600 per month as of June 2024, based on data collected from public sources (Figure 2). While high, this increase is still below the range of modeled potential cost increases based on the potential loss 7-10% of all rental housing units, including a large proportion of affordable housing, in Maui County.
- The supply-demand model has some important limitations.
 - First, the amount of data available post-fire is small, meaning that the full breadth of market dynamics, including effects from housing recovery assistance programs, are difficult to quantitatively detect but might become more apparent over time. For example, it does not take into account units in the Direct Lease program that may have previously been owner-occupied or long-term rental units.
 - Maui County provided information after the modeling for this study was completed indicating that 370 units receiving tax exemptions were not previously operating as short-term rentals. While Argonne has not yet had the opportunity to review the data to date, it will be the subject of additional evaluation.
 - The model also could not detect potential effects from landlords ending leases or raising rents on properties that are not in the Direct Lease program, both of which have been raised by stakeholders and described in more detail below.
 - Longer-term monitoring and analysis, informed by a greater quantity of data, will likely provide better insight into the full set of dynamics affecting the rental market, including potential effects from recovery assistance.
 - Technical documentation of the supply-demand model is available upon request.

Finding 3: Changes to Landlord Behaviors

- Argonne detected possible changes in landlord behavior since the fire that are likely attributable to rental rates that FEMA and other assistance programs paid.
 - The State of Hawai‘i Office of Consumer Protection received approximately 700 housing-related complaints between August 2023 and April 2024, with most relating to lease termination or rent increases.³⁴ Because the Office of Consumer Protection does not have enforcement authority, they refer complaints where illegal behavior is possible to the State of Hawai‘i Attorney General’s Office for investigation. Of the 137 cases investigated by the Attorney General’s office, 79 were found not to be a violation, 25 violations were corrected, and 33 investigations are ongoing as of May 2024.³⁵

- These numbers are notable because the governor's [post-fire emergency proclamation](#) temporarily prohibits rent increases and the termination of leases, even in cases where a lease is month-to-month, except for the following circumstances:
 - Termination with cause (e.g., damage to the property);
 - Sale of the property;
 - Renovation of the property; and
 - Cases where a property owner plans to re-occupy the property.
- The number of complaints and subsequent investigations may indicate that while price increases could not yet be attributed to Direct Lease in the supply-demand model, the behavior of some landlords may have changed leading to secondary displacement or increased costs for some renter households outside of the burn area.
- As noted previously, FEMA terminates leases in cases where they determine, through coordination with the Attorney General's Office, that a landlord has wrongfully ended a lease in order to participate in Direct Lease. To date, there have been fewer than 10 instances of leases needing to be terminated.

Finding 4: Changes to Tourism

- Tourism rates have significantly decreased since the fire. Data analysis could not substantiate a specific correlation to FEMA Direct Lease.
 - Tourism to Maui County significantly dropped following the fires. As of the end of 2023, visitor spending decreased by 1.5% year over year from 2022. When comparing visitor expenditures since the fire through the end of April 2024 to the same time period the previous year, visitor expenditures in Maui are down 27%. County gross domestic product dropped 7% post-fire and has not yet recovered.³⁶ According to data from DBEDT, daily passenger counts, visitor days, and visitor spending rates from January 2024 to May 2024 have all decreased about 24% compared to the same period in 2023.³⁷
 - FEMA has secured leases for 1,362 units, or approximately 10% of the current short-term rental stock. Year-to-date occupancy rates for short-term rentals in Maui County remain around 57.7% as of May 2024, below 2023 occupancy rates of 65.6%, indicating that inventory for tourists currently exists.
 - Approximately 50% of the 1,362 Direct Lease units FEMA secured are in or near Lahaina. Short-term rental options, especially two-bedroom units, in West Maui may be limited in the near term as a result.
 - Longer term, UHERO forecasts that daily visitors will likely increase from 48,500 daily visitors as of February 2024 to 52,000 in the summer of 2024 and 57,000 by the summer of 2025.³⁸ The State of Hawaii, Maui County, and other organizations are actively promoting tourism statewide and in Maui.
 - The combination of the number of units under contract with FEMA, as well as the possible reduction of short-term vacation rental inventory due to Senate Bill 2919 and proposed follow-on regulation from Maui County, might result in a tighter accommodation market and constraints to tourism in Maui, particularly in West Maui where many of the Direct Lease units are located. Senate Bill 2919, signed by Governor Green in May 2024, clarifies the counties' authority to use land use regulations to regulate short-term rentals.

Finding 5: Changes to Short-term Rental Availability

- Based on current short-term rental stock and vacancy rates, Argonne does not foresee a near-term challenge for FEMA in securing units for Direct Lease. However, Senate Bill 2919 and proposed follow-on regulation from Maui County could reduce the short-term rental supply and impact the availability of Direct Lease units beyond 2026. In addition, some property owners may not continue to participate in Direct Lease if tax exemptions do not extend beyond the current 18 months.
 - As of May 2024, data from DEBDT indicate that even with units secured through Direct Lease, there is currently a lower occupancy rate in the county-wide short-term rental market than before the fire. Based on this assumption, even if owners currently participating in Direct Lease decided not to renew a lease with FEMA, other units should be available currently. Stakeholders noted that vacation rental statistics are an average value and do not specifically account for individual higher demand days, such as weekends or holidays, meaning there may be times where occupancy rates are higher than monthly statistics capture.
 - A long-term Direct Lease program may have negative secondary effects. For example, a survivor household may be required to move at the end of a current lease if the property owner decides not to renew its agreement with FEMA, which could result in additional disruptions. Furthermore, a long-term Direct Lease effort could continue to incentivize adverse landlord behavior to end long-term leases with Maui residents in favor of the possibility of participating in Direct Lease.
 - Because of limited inventory in West Maui, 50% of currently secured Direct Lease units are not located near Lahaina. A long-term Direct Lease effort could lead to households being disconnected from local schools, places of employment, services, and their community, for a period of years.
 - Stakeholders noted that FEMA’s programs are designed for interim needs and therefore Direct Lease participation requires regular recertifications. Households will continue to need to demonstrate that they are attempting to secure permanent housing. At the same time, current housing market conditions are such that securing permanent housing will be challenging for many households.
 - Some state, local, and non-profit administered programs are authorized for 1 year or less and will require continued funding to meet longer-term interim housing needs. If new funds are not secured, populations not eligible for FEMA assistance will experience disruptions in assistance before they can secure permanent housing.

Finding 6: Anticipated Time to Rebuild

- Argonne’s estimates come from a time-to-recovery model whose inputs include the following:
 - **Available parcels:** Affected structures or parcels in the burn area that are zoned for residential use as documented in Maui County tax records. Parcels are considered available for permitting and reconstruction once debris-removal activities are complete.
 - **Permits:** Argonne reviewed both historical and current permitting times; Argonne incorporated the county’s recent progress with implementing the expedited 15-day permit processing time into the model.
 - **Construction:** Argonne based estimates of construction timelines on both Maui County annual permit volume, as well as qualitative information collected from construction industry stakeholders.

- Industry stakeholders specifically pointed out that there are long lead times for materials that need to be shipped from the continental United States to Maui via Honolulu. In addition, they noted that the industry faces some labor constraints, especially for skilled labor (e.g., electricians and plumbers).
- **Cost:** Cost estimates are calculated using square-foot estimates for single family, multi-family, hotel, commercial, and industrial development. Estimates were taken from the Rider, Levett, Bucknall Construction Cost Calculator for Honolulu and adjusted for increased construction costs post fire.
- Argonne developed three scenarios to explore potential rebuilding timelines. For this model, Argonne researchers assumed that most permitting and construction activities will begin in early 2025. Argonne selected this date based on the status of debris clearance and utilities restoration efforts in April 2024.
 - **Baseline Reconstruction:** Results in an approximately 6-year timeline to rebuild all allowable structures in Lahaina. This scenario assumes that the number of units to be rebuilt will be the maximum allowed under current zoning in Lahaina. This means that fewer units will exist post-disaster than pre-disaster due to the number of unpermitted structures that previously existed; the scenario assumes up to 2,000 parcels will be rebuilt. This scenario assumes a maximum of 1,000 housing projects island-wide underway at any given time.
 - **Enhanced Reconstruction:** Results in an approximately 4.5-year timeline to rebuild. This scenario incorporates incremental infrastructure improvements, specifically a 15% reduction in construction time due to improvements in construction labor availability and supply-chain enhancements. The number of units under construction at any time is 50% higher than the baseline reconstruction scenario.
 - **Optimized Reconstruction:** Results in an approximately 3-year timeline to rebuild. In addition, this scenario incorporates an additional 25% reduction in construction completion time due to significant enhancements in the availability of labor, supply chain, and inspection timeliness during the construction process. This scenario also considers significant improvements to water and wastewater infrastructure, which enables the construction of more units than other scenarios.
- Stakeholders pointed to additional factors that may have impacts on reconstruction timelines, including:
 - **Recovery Funding:** Stakeholders indicated that additional federal appropriations will be needed to meet recovery needs.
 - **Underinsurance:** Interviewees expressed concern that even those families that have insurance are likely underinsured; for example, without inflation riders, it is likely that insurance covered the value of the home 10-20 years ago and will be insufficient to cover the cost of construction today given the rate of inflation in construction costs. In addition, insurance costs are rising.
 - **Concentration of rental units:** Stakeholders noted that there was a high concentration of rental units pre-fire, and that renters are not able to control the rebuilding timeline.
- Based on the factors considered in the model, Argonne estimates that rebuilding housing stock will take 3–6 years or longer. However, fewer rental units will likely be available post-fire under current zoning and development conditions. Without intervention, the rental market will take years longer to stabilize.
 - Preliminary time-to-recovery modeling indicates based on current policy, capacity, and other factors, it will likely take 6 years for most affected structures to be rebuilt within Lahaina. To stabilize the rental

market, additional new development may be required, either through increased density in Lahaina or other new development in West Maui.

- Factors that influence residential development, redevelopment, or rebuilding include the following:
 - Availability of water, wastewater, and other infrastructure (e.g., roads, traffic lights);
 - Strict and extensive land use and development regulations by both county and state government;
 - Capacity of county government to process and oversee development permits;
 - Availability and cost of financing for developers and home buyers; and
 - Construction supply chains and labor force capacity.

Finding 7: Comparison between Group Sites and Direct Lease

- Based on current estimates, group sites will take longer than Direct Lease units to become available to survivor households, and the cumulative costs of ATTHUs are generally more expensive than Direct Lease units. When accounting for site preparation, procurement, and shipping, it will take approximately 1 year from the fire for the first units to be complete at Kilohana, while Direct Lease units are available now. Any additional group sites may take another 12–18 months.
- If survivors moved into ATTHUs from Direct Lease units, it could free up short-term rental units for tourists and alleviate concerns related to tourism impacts discussed earlier in the report. It could also increase housing supply resulting in some price moderation and alleviate potential for secondary displacement caused by landlords seeking higher rents. Direct Lease units, on the other hand, are likely to have more amenities than ATTHUs and may be preferable to disaster survivors. The Direct Lease units also do not come with the potential for extensive improvement in infrastructure and utilities, as those are already in place.
 - Utilization of ATTHUs by survivors may depend on where ATTHU group sites are located and whether applicants are willing to relocate outside of West Maui. If most applicants want to live in West Maui, they may not want to relocate to group sites outside of West Maui. Additionally, if they do not relocate, they may have a tougher time finding alternative housing resources in West Maui, which will further delay their long-term temporary housing and permanent housing plans.

Finding 8: Temporary Housing Timeframes

- The cost and complexity of developing new affordable housing in Maui, and West Maui in particular, means that temporary construction is likely to remain in place long term. Due to the constraints on rebuilding and new development highlighted in previous findings, it will likely take many years for the rental market to stabilize enough for many survivors who rented to be able to re-enter the rental market.
- Many individuals in the burn area, especially renters, had a high rent burden before the disaster. Argonne anticipates this burden for lower income individuals will be exacerbated by the continued deficit in affordable housing stock resulting in people potentially needing to use temporary disaster housing for long-term use.
- Both the FEMA group site at Kilohana and the adjacent State of Hawai‘i group site are located on or adjacent to land that will eventually be transferred to the state’s Department of Hawaiian Homelands for future use as homesteads for Native Hawaiians.

Finding 9: Resilient Recovery Requires Addressing Root Causes

- Addressing underlying root causes of Maui’s housing crisis may help to improve recovery timelines, survivor outcomes, and Maui’s long-term resilience. Multiple actions such as streamlining of the development and permitting process, infrastructure improvements, new infrastructure development, and construction supply chain and labor interventions are not within the scope of interim housing programs that could help to address longstanding barriers to affordable housing in West Maui. Additional policy actions such as rental market regulation and renter protection policies also may alleviate impacts to renters. Given the high concentration of renters whom the fire impacted, these interventions could be critical to a more expedient and resilient recovery process.
- Following the completion of this report, Argonne will continue to support FEMA's work with Maui County to identify and implement specific interventions that could be considered to address root causes of the housing crisis and enhance the recovery process. Argonne will provide analysis of these potential interventions, including feasibility considerations and tradeoff analysis to FEMA and Maui County to help inform their efforts to prioritize recovery actions. Examples of interventions are shown in Table 4, below.

Table 4: Examples of Potential Interventions

ROOT CAUSE /CATEGORY	POTENTIAL INTERVENTION	FEASIBILITY CONSIDERATIONS
Policy, Regulation, and Administrative Capacity	Streamline permitting processes and add staff to reduce permitting timelines	<ul style="list-style-type: none"> • Maui county has already undertaken actions, including an expedited permitting process for the affected area, that has reduced permitting approval time to 15 days.
	Develop pattern books or pre-approved designs to streamline reconstruction.	<ul style="list-style-type: none"> • This intervention would need to align with the values, priorities, and character of the community. • Implementation of this approach could simplify construction processes and create opportunities for bulk ordering, staging, and construction labor optimizations.
	Codify and strengthen appropriate tenant protections	<ul style="list-style-type: none"> • This intervention could incorporate best practices from other communities; however, solutions would need to be appropriate for Maui County’s unique context. Argonne will evaluate best practices from other communities that have addressed significant rental housing challenges through tenant protections to inform possible actions Maui can take.
Infrastructure and Water Resources	Upgrade the wastewater treatment plant in West Maui to increase capacity, improve reliability, and to enable distribution of both potable and non-potable water.	<ul style="list-style-type: none"> • This intervention would be costly and would likely require additional resources to complete.. • Building the capability for water reuse for certain applications (e.g., irrigation) could potentially help increase the availability of potable water and enable the development of additional affordable housing.
	Develop infrastructure (e.g., water, wastewater, energy) to facilitate the development of additional affordable housing.	<ul style="list-style-type: none"> • This intervention would be resource and time intensive but could result in a longer-term increase in affordable housing supply.

Supply Chain and Labor Enhancements	Explore strategies for bulk ordering and combined materials staging for construction supplies	<ul style="list-style-type: none"> • Bulk ordering and combined staging could reduce lag times for material deliveries. • Implementing this strategy would require that in some cases, the same or similar materials be used for multiple projects.
	Explore strategies to increase the availability of skilled trades (e.g., coordinating strategies to bring in off-island labor; workforce development)	<ul style="list-style-type: none"> • Workforce development could take time to alleviate labor shortages but produce longer-term gains. • Coordination between state and local government and the construction industry could improve the ability to leverage off-island skilled labor.
Financing and Underinsurance	Develop and implement financing programs (i.e. reconstruction assistance, down payment assistance, loans or loan guarantees) to rebuild and expand affordable housing.	<ul style="list-style-type: none"> • This may require supplemental appropriations for programs such as Community Development Block Grants – Disaster Recovery (CDBG-DR)
	Enable Alternative Dwelling Units (ADU) through zoning and provide financing to acquire and construct ADUs where feasible.	<ul style="list-style-type: none"> • Maui County is already undertaking efforts, including the recently launched Ohana Assistance Pilot Program, to increase the supply of ADUs

Conclusions and Potential Additional Areas of Research

- The Lahaina fire is significant to Maui and Hawai‘i for many reasons. It displaced thousands of Maui residents and led to the loss of 102 lives. It took place in the historical seat of the Kingdom of Hawai‘i, affecting lands and resources that are critical to Native Hawaiians and the culture of Hawai‘i. It destroyed 4,005 structures in a community that was at the heart of Maui’s economy, where many workers who powered the tourism economy lived.
- The Lahaina fire took place in a community where significant housing challenges already existed. Most renters were housing cost burdened, as were many homeowners; housing options were limited, and crowding rates were significantly higher than in other areas of the United States.
- An initial assessment of the data could not quantitatively detect impact from temporary housing programs, including Direct Lease, on rental costs across Maui at this time. However, indications exist that lease terminations may have increased since the fire and that the current temporary housing strategy may have influenced the behavior of some property owners. Other effects are possible and could be explored through longer-term research, monitoring, and evaluation.
- Because the fire has reduced housing inventory in a community where a significant deficit of affordable housing already existed, rebuilding Lahaina in a way where residents can fully re-enter the housing market will take more than rebuilding structures in accordance with current zoning. It will require creative solutions to address underlying land availability, natural resources, infrastructure, supply chain, and labor constraints. It will also require community consensus.
- Recovery from the fire is still in the early stages, and the long-term impacts to the housing market are still unknown and dynamic. Circumstances that could influence the housing market recovery and the need for federal disaster housing assistance include the following:

- **Changes to survivor needs:** The need for Continued Temporary Housing Assistance, Direct Lease, or ATTHUs could change as the market stabilizes and disaster survivors find alternative housing, but it could also increase as insurance benefits or other resources run out.
 - **State modular housing construction:** The state has plans to build 450 units near Lahaina. These additions to the housing supply could make a significant impact on rental prices and need for FEMA's programs.
 - **Expedited permitting:** Maui County has developed a modified permitting application to consolidate the electrical, plumbing, driveway, grading, and other permits issued by the Department of Public Works and has hired a third-party vendor to supplement its review capacity.³⁹ The county also opened a central location for the expedited permitting effort. As of July 2024, These actions have led to a decrease in permitting approval time to 15 days.
 - **Regulatory intervention:** Housing affordability is an issue throughout the State of Hawai'i. The governor and legislature have taken a range of actions including emergency proclamations and new legislation to address the regulatory environment. Current protections for renters are temporary in nature as they are primarily being done through emergency proclamation by the governor. The county will have to review and adopt new land use regulations and processes in response to these state-level actions, but what actions the county will take, and the timing of implementation of those actions, are not clear.
 - **FEMA Individual Assistance Multi-family Lease and Repair:** FEMA's Individual Assistance program is exploring activating Multi-family Lease and Repair, as part of Direct Temporary Housing Assistance, which would allow FEMA to lease multi-family buildings and make minor repairs to temporarily house eligible households. This program could increase the available housing supply.
 - **Disaster settlements:** The state's One 'Ohana Fund was established to help aid the recovery of families who lost a loved one as well as individuals who suffered severe injury in the devastation of last year's wildfires. This fund is not meant to cover property damage, business losses, and physical injuries that did not require a hospital stay or emergency outpatient treatment. Future phases of the One 'Ohana Initiative include many of the recovery programs the state has initiated or that have been launched as part of various efforts to benefit the entire state.⁴⁰
- Future research designed to analyze and address these key inhibitors to housing recovery can play a significant role in guiding ongoing policy and resource allocation decisions.

Appendix: List of Interviewees

Agency/Department/Organization
STATE
Office of The Governor
Department of Attorney General, Insurance Division
Department of Commerce and Consumer Affairs, Office of Consumer Protection
Department of Hawaiian Home Lands
Department of Human Services
Hawai'i Emergency Management Agency
Hawai'i Housing Finance and Development Corporation
Hawai'i Tourism Authority
LOCAL
Office of the Mayor
Lāhainā Advisory Team
Maui County Housing Task Force
Maui County Department of Public Works
FEDERAL
U.S. Department of Interior
FEMA
U.S. Department of Housing and Urban Development
U.S. Environmental Protection Agency
U.S. Army Corps of Engineers
U.S. Department of Agriculture
PRIVATE SECTOR/NON-PROFIT ORGANIZATIONS
American Institute of Architecture Honolulu
Building Industry Association of Hawai'i
Council for Native Hawaiian Advancement
Global Empowerment Mission
Maui Chamber of Commerce
Maui Economic Opportunity
National Multifamily Housing Council
National Association of Home Builders
Ohana Hope Community
Pacific Resource Partnership
Roots Reborn Lahaina
RESEARCH ENTITIES
University of Hawai'i, Hulihiia Center for Sustainable Systems
University of Hawai'i, Planning/Pacific Disaster Training Center
University of Hawai'i, Economic Research Organization

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