



**U.S. Department of Housing and Urban Development**

Honolulu Field Office – Region IX  
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[www.hud.gov](http://www.hud.gov)  
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OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT  
9CD-240111

December 8, 2023

Ms. Patience M.K. Kahula  
CDBG Program Director  
Office of the Mayor  
County of Maui  
200 South High Street  
Wailuku, Hawaii 96793

Dear Ms. Kahula:

SUBJECT: Substantial Amendments and Reprogramming of Funds Approval  
2020 – 2024 Consolidated Plan  
Citizen Participation Plan (CPP)  
Program Year (PY) 2019 Annual Action Plan  
PY 2022 Annual Action Plan  
PY 2023 Annual Action Plan

This is in response to the County of Maui's (County's) requests to approve substantial amendments to the 2020 – 2024 Consolidated Plan and PYs 2019, 2022, and 2023 Annual Action Plans and the reprogramming of Community Development Block Grant (CDBG) and CDBG – CARES Act (CDBG-CV) funds, to facilitate recovery from the Maui wildfires. In addition, the County updated its CPP. The County issued a public notice, providing the following information:

**Substantial Amendment to Citizen Participation Plan and Consolidated Plan**

- In the event of a disaster, the County of Maui's standard CDBG project selection process will be suspended. As an alternative, in response to the disaster, the Mayor of the County of Maui will select and approve CDBG eligible activities as described in 24 CFR 570.201, including but not limited to, 24 CFR 570.201(a) Acquisition, 24 CFR 570.201(c) Public Facilities, 24 CFR 570.201(d) Clearance and Remediation Activities, 24 CFR 570.201(e) Public Service, and 24 CFR 570.201(f) Interim Assistance.
- The County will reprogram CDBG funds from Program Years 2019 CDBG-CV, 2022 and 2023 and will use Program Year 2024 funds to respond to the disaster caused by the wildfires. The Mayor of the County of Maui will select and approve CDBG eligible activities as described in 24 CFR 570.201, including but not limited to, 24 CFR 570.201(a) Acquisition, 24 CFR 570.201(c) Public Facilities, 24 CFR 570.201(d) Clearance and Remediation Activities, 24 CFR 570.201(e) Public Service, and 24 CFR 570.201(f) Interim Assistance in West Maui.
- The County of Maui waives the CPP requirement of public hearings for substantial amendments or reprogramming. Public notice requirements will still apply.

The County proposes reprogramming CDBG-CV funds as follows:

Project No.	Activity Type	Project Name	Approved Project Budget	Amount Reprogrammed	Revised Project Budget	Current IDIS Funded Amount
B-20-EW-15-0003 IDIS #236	Public Service	MEO CDBG-CV 1, 2, 3	\$1,789,670.00	\$893,142.70	\$896,527.30	\$896,527.30
B-20-EW-15-0003 IDIS #234	Public Service	FLC Covid-19 Housing Assistance	\$1,789,670.00	\$833,059.30	\$1,289,670	\$956,510.70
<b>Total Reprogrammed to Activities</b>				<b>\$1,726,202.00</b>		
<b>TO:</b>						
B-20-EW-15-0003 IDIS #	Acquisition	County of Maui - CDBG-CV Senior Housing	New Project	\$1,368,268.00	\$1,368,268.00	IDIS Activity Pending
B-20-EW-15-0003 IDIS#	Admin.	CDBG-CV Administration	New Project	\$357,934.00	\$357,934.00	IDIS Activity Pending
<b>Total Reprogrammed to Activities</b>				<b>\$1,726,202.00</b>		

The County proposes reprogramming PY 2022 and 2023 funds as follows:

Project No.	Activity Type	Project Name	Approved Project Budget	Amount Reprogrammed	Revised Project Budget	Current IDIS Funded Amount
B-22-DH-15-0003 IDIS #253	Public Facilities	Hale Makua Wailuku Rehab	\$311,750.00	\$311,750.00	\$0.00	\$0.00 Cancelled
B-22-DH-15-0003 IDIS #255	Public Facilities	Hale Makan Mentor Center Restoration Part 2	\$48,000.00	\$48,000.00	\$0.00	\$0.00 Cancelled
B-22-DH-15-0003 IDIS #256	Public Facilities	MEO Molokai Bus	\$199,000.00	\$199,000.00	\$0.00	\$0.00 Cancelled
B-22-DH-15-0003 IDIS #257	Public Facilities	MKK Landfill Wood Hog Grinder	\$910,805.00	\$910,805.00	\$0.00	\$0.00 Cancelled
B-23-DH-15-0003 IDIS #269	Public Facilities	Exterior Rehab of MFSS Building	\$216,913.00	\$216,913.00	\$0.00	\$0.00 Cancelled
B-23-DH-15-0003 IDIS # 270	Public Facilities	Lanai Fire Tanker	\$950,000.00	\$950,000.00	\$0.00	\$0.00 Cancelled
<b>Total Reprogrammed to Activities</b>				<b>\$2,636,468.00</b>		
<b>TO:</b>						
B-23-EW-15-0003 IDIS #	Acquisition	County of Maui - CDBG-CV Senior Housing	New Project	\$2,636,468.00	\$1,368,268.00	IDIS Activity Pending

<b>Total Reprogrammed to Activities</b>				<b>\$2,636,468.00</b>		
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After reviewing the transmittal and documentation provided, HUD approves the County's substantial amendments and reprogramming requests. In the future, please obtain approval for substantial amendments from HUD before reprogramming funds in IDIS.

As a reminder, timeliness regulations at 24 CFR 570.902 require grant recipients to carry out their CDBG-funded activities in a timely manner, thus ensuring low- and moderate-income persons are assisted. HUD considers a grantee in compliance if there is no more than 1.5 times its annual grant remaining in the line-of-credit on the CDBG timeliness test date. As of this writing, the expenditure ratio for the County is 2.36. The County must expend and draw a minimum of \$1,574,448 in "regular" CDBG funds between now and May 2, 2024, to pass the official CDBG timeliness test. HUD encourages the County to take any necessary steps to meet the timeliness standard.

In addition, as of this writing, Congress has not passed the federal budget and is looking for available funds to recapture. Since the COVID-19 Public Health Emergency expired on May 11, 2023, the CDBG-CV funds are an area of potential fund recapture. We therefore recommend expending MC's \$1,735,153 CDBG-CV balance immediately.

If you have any questions or need assistance, please contact Stephanie Kaimana On, Senior CPD Representative, at (808) 457-4680 or [stephanie.w.kaimanaon@hud.gov](mailto:stephanie.w.kaimanaon@hud.gov). If responding in writing to this letter, please provide your response as a PDF document to [CPDHonolulu@hud.gov](mailto:CPDHonolulu@hud.gov).

Sincerely,



Mark A. Chandler, Director  
Office of Community Planning  
and Development

cc:

File: 9CD Official Files, MC\_2020-2024 ConPlan

File: 9CD Official Files, MC\_PY2019

File: 9CD Official Files, MC\_PY2022

File: 9CD Official Files, MC\_PY2022