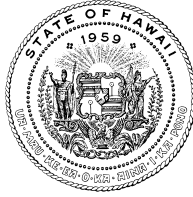


JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR



DEAN MINAKAMI
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM

HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300

HONOLULU, HAWAII 96813

FAX: (808) 587-0600

IN REPLY REFER TO:
25:PECB/68

December 31, 2025

Ms. Mary Alice Evans, Director
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Ms. Evans:

Subject: Record of Environmental Consideration
Front Street Apartments Redevelopment Project
1056 Front Street, Lahaina, Maui
Tax Map Key: (2) 4-5-003: 013

On August 8, 2023, the Maui wildfires destroyed the 142-unit affordable rental housing development known as the Front Street Apartments Project (Original Project). Subsequently, the property owner surrendered the ground lease to the Hawaii Housing Finance and Development Corporation (HHFDC).

HHFDC has entered into an agreement with Front Street I, LP (Developer) to redevelop the Project site. The Front Street Apartments Redevelopment Project (Redevelopment Project) will create 240 residential units, including up to 238 affordable rental units and two units for on-site managers. The Redevelopment Project will feature 19 three-story walk-up buildings, adding 98 more units than the Original Project.

On July 9, 2025, Hawaii Governor Josh Green, M.D., signed into law Senate Bill 1170, Senate Draft 2, House Draft 3, Conference Draft 1, making it Act 313, Hawaii Session Laws 2025. Act 313 exempts certain affordable multi-family housing redevelopment projects from the requirement of HRS 343. This Redevelopment Project is covered by the exemption provided through Act 313. This Record of Environmental Consideration documents the history behind the environmental review of this Project. HHFDC requests publication of this letter in the next available issue of *The Environmental Notice*.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Minakami".

Dean Minakami
Executive Director

Attachment

FRONT STREET APARTMENTS REDEVELOPMENT PROJECT RECORD OF ENVIRONMENTAL CONSIDERATION

Pursuant to Chapter 343, Hawaii Revised Statutes (HRS) and
Section 11-200.1, Hawaii Administrative Rules (HAR)

The Hawaii Housing Finance and Development Corporation (HHFDC) is the applicant and approving agency.

In 2000, the Front Street Apartments Project (Original Project) was built by 3900, LLC on the northern side of Lahaina town and a half-mile south of the Lahaina Cannery Mall. The Original Project site has a total land area of 8.538 acres and is zoned A-1. The address is 1056 Front Street, Lahaina, and the tax map key (TMK) is (2) 4-5-003: 013.

The Original Project was a 142-unit affordable rental housing development that was financed in part with federal and state low-income housing tax credits. Under the tax credit program, the Original Project was required to have 141 units set aside for households earning up to 50% (70 units) and up to 60% (71 units) of the area median income. One unit was reserved for a resident manager. In 2019, HHFDC acquired the leased-fee interest in the Project site land for \$14.93 million.

On August 8, 2023, the Maui wildfires destroyed the Original Project and other structures on Maui. After the Maui wildfires, the property owner exercised its right to surrender the ground lease, and HHFDC has free-and-clear, fee-simple title to the Project site land, giving HHFDC full control over its redevelopment.

Project Description. HHFDC has entered into an agreement with Front Street I, LP (Developer) to redevelop the Project site. The Front Street Apartments Redevelopment Project (Redevelopment Project) is a multi-family rental housing redevelopment project that will provide housing in West Maui for those earning at or below 30 percent to 120 percent of the area median income.

The Redevelopment Project will consist of the following actions:

1. Property acquisition of 60 Kenai Street, which has a total land area of 0.19 acre, located within the footprint of the primary property. The zoning for this parcel is R-2. TMK: (2) 4-5-003: 014.
2. Demolition of one residential building, one commercial building, and several carports that are standing to prepare the site for redevelopment. These structures were partially burned during the fires and are beyond repair.
3. Reconstruction of up to 238 affordable rental units over two phases and two residential units for on-site managers for a total of 240 residential units. The units will be housed in 19 three-story garden-style walk-up buildings and will include 98 additional residential units as compared to the Original Project, by adding a third floor to the buildings. A total of 336 surface parking stalls, including ADA stalls, are proposed. Amenities will include a community room building, fitness area, two laundry facilities, outdoor barbecue area, tot lot playground, basketball court, dog park, and bicycle racks.

Technical studies were completed for the Redevelopment Project. A summary of the studies is provided below:

1. *Archaeological Monitoring Plan.* As previously noted, the Redevelopment Project is a reconstruction of the Front Street Apartments that were destroyed in the August 2023 wildfires in West Maui. There are remaining structures that will be demolished; however, the majority of structures were demolished and removed as part of the larger debris removal completed by the United States Army Corps of Engineers in 2024. It is noted that TMK (2) 4-5-003:013 included a known burial site. As such, an Archaeological Monitoring Plan (AMP) was prepared for the Redevelopment Project. Archaeological monitoring will be implemented during ground-altering activities for the Redevelopment Project. The AMP recommended that a Burial Treatment Plan (BTP) be prepared and submitted to the State Historic Preservation Division (SHPD) for review and approval prior to the commencement of ground work for the Redevelopment Project. The Developer is preparing the BTP and will submit it to SHPD for review and approval.
2. *Preliminary Engineering and Drainage Report.* A Preliminary Engineering and Drainage Report (PEDR) was prepared for the Project. As the Redevelopment Project site had been previously developed and severely damaged in the August 2023 wildfire, the PEDR assumed that the on-site drainage system would need to be redesigned and rebuilt. The PEDR calculated that the post-construction runoff will be approximately 19.62 cubic feet per second, corresponding to an increase of 22,998 cubic feet of volume for the retention basin. The Redevelopment Project will include catch basins in the parking lot areas as well as a subsurface drainage system, designed to accommodate the post-development runoff such that there will be no increase in the runoff sheet flowing from the Redevelopment Project site after the Project is constructed. The proposed drainage system will also include post-construction Best Management Practices and will meet the requirements of Maui County.

As a previously developed site, water and wastewater infrastructure are available to service the Redevelopment Project site. The Developer is coordinating with Maui County to provide water and wastewater services for the Project. The Redevelopment Project also proposes to implement a greywater reuse system, to the extent commercially feasible as determined by the Developer, which would reduce the potable water and wastewater needs for the Redevelopment Project. Electrical, telephone, and cable television systems and services are also available for the Redevelopment Project site.

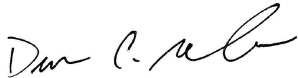
3. *Traffic Assessment Report.* A traffic assessment report (TA) was completed for the proposed Redevelopment Project. As the Original Project was a previously existing residential development, the TA reviewed the potential traffic impacts for the additional residential units proposed (98 units). As much of the surrounding area was impacted by the August 2023 wildfires, the TA utilized pre-fire traffic count data in the analysis. A new driveway access is being proposed from Front Street, which was not included in the prior residential development. The TA noted that the new driveway access was anticipated to reroute only 10 to 20 inbound/outbound vehicles and would have a minimal impact. All study intersections were forecasted to operate at nearly the same level of service, with or without the Redevelopment Project. The TA concluded that the Redevelopment Project would generate approximately 67 new trips during the morning peak hour and 53 new trips during the afternoon peak hour. The TA also noted that with the new driveway

access onto Front Street, a southbound left-turn lane is not needed at the intersection. A speed study was conducted on Front Street, and for the portion of the road just north of Kenui Street, it showed a relatively low 85th percentile operating speed of 25 miles per hour (mph), which is near the posted 20 mph speed limit.

Acquisition and Construction Schedule. HHFDC has acquired the property listed in item 1 above, and the parcel will be consolidated into the Redevelopment Project site. The construction schedule is unknown as it is being formulated, but the goal is to complete construction by year-end 2029.

This Redevelopment Project will use State land and funds, which triggers the need for HRS 343 compliance.

On July 9, 2025, Hawaii Governor Josh Green, M.D., signed into law Senate Bill 1170, Senate Draft 2, House Draft 3, Conference Draft 1, which became Act 313, Hawaii Session Laws 2025. Act 313 exempts certain affordable multi-family housing redevelopment projects from the requirement of HRS 343. The Redevelopment Project is covered by the exemption provided through Act 313. This Record of Environmental Consideration documents the history behind the environmental review of this Project.



Signature of Director or Delegate

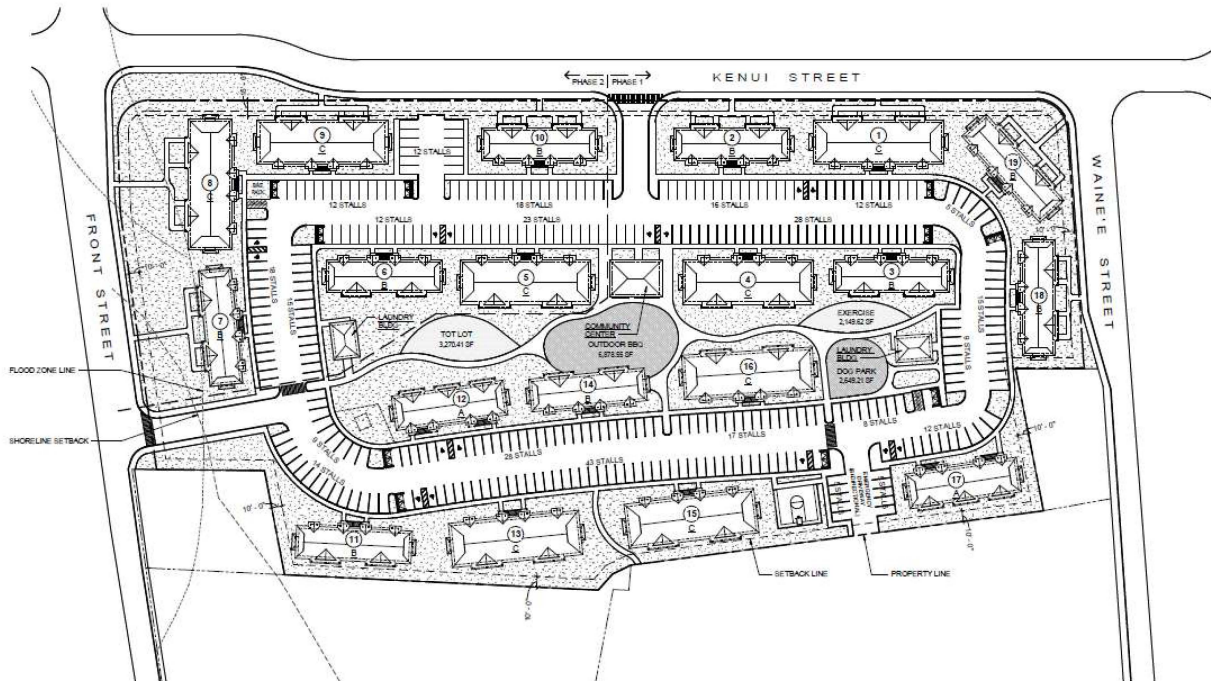
01/02/2026

Date

Attachment

Exhibit A – Redevelopment Project Site Plan

Exhibit A Redevelopment Project Site Plan



A1 ARCHITECTURAL SITE PLAN
1" = 40'-0"

0 40 80
SCALE: 1" = 40'-0"