



HAWAII HEALTH SYSTEMS

C O R P O R A T I O N

Quality Healthcare For All

November 28, 2025

GC-25-005

Environmental Review Program
DBEDT - Office of Planning and Sustainable Development
235 S. Beretania St #702
Honolulu, Hawaii 96813

RE: EA Exemption List Request from Hawaii Health Systems Corporation (HHSC)

Dear Members of the Environmental Advisory Council,

My name is Andrea A. Suzuki and I serve as Vice President and General Counsel of Hawai'i Health Systems Corporation (HHSC).

HHSC is a State agency and serves as the "safety net" hospital system for Neighbor Island acute care needs and the "safety net" for the State's long term care needs, which means that HHSC provides services to all regardless of the ability to pay. HHSC has eleven main facilities located in four different regions of the State: Hilo Benioff Medical Center, Yukio Okutsu State Veterans Home, Honoka'a Hospital, and Ka'u Hospital (East Hawai'i Region); Kona Community Hospital and Kohala Hospital (West Hawai'i Region); Leahi Hospital, Maluhia, and the Daniel K. Akaka State Veterans Home (Oahu Region); Kauai Veterans Memorial Hospital and Samuel Mahelona Memorial Hospital (Kauai Region). HHSC also has numerous medical clinics and urgent care clinics on Hawai'i Island and Kauai.

Attached is HHSC's proposed Comprehensive Exemption List submitted pursuant to Hawai'i Administrative Rules Title 11, Chapter 200.1 for your review. Thank you for your efforts as we work to deliver quality healthcare to our island community.

Sincerely,

Andrea Suzuki
Vice President & General Counsel

Enclosure – Attachment 1 HHSC Comprehensive Exemption List

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COMPREHENSIVE EXEMPTION LIST FOR THE HAWAII HEALTH SYSTEMS CORPORATION (HHSC)

Pursuant to HAR Title 11, Chapter 200.1, HHSC has determined that the following types of actions, where they fall within the two classes of action (Part 1 and 2), shall generally be exempt from the preparation of an Environmental Assessment.

PART 1 ACTIONS (DE MINIMIS ACTIVITIES)

Pursuant to §11-200.1-16 Hawaii Administrative Rules (HAR), HHSC considers the following activities listed under Part I Actions to be routine and ordinary functions or minor actions within its jurisdiction or expertise that by their nature do not have the potential to adversely affect the environment more than negligibly, individually, or cumulatively.

The types of activities include, but are not limited to, the following listed by the general types of actions eligible for the exemptions.

Type 1. Operations, repairs, or maintenance of existing structures, facilities, equipment, or topographical features, involving minor expansion or minor change of use beyond that previously existing:

1. All building features and structures, including:
 - a. Building.
 - b. Structure.
 - c. Furniture.
 - d. Dwelling units.
 - e. Equipment.
 - f. Electrical system.
 - g. Communication system.
 - h. Plumbing system.
 - i. Heating, ventilation, and air conditioning system.
 - j. Fire protection system.
 - k. Drainage collection and distribution system.
 - l. Wall and trash enclosures.
 - m. Waste treatment facilities.
 - n. Laundry facilities.
 - o. Interior alterations and renovations to existing facilities including but not limited to partitions, doors, flooring, wall coverings, lighting, built-in furnishing, and built-in equipment.

2. All outside campus features, including:
 - a. Wall, fencing, curbing, gates, guardrails, safety barriers.
 - b. Walkways and ramps.
 - c. Roadways.
 - d. Parking lots or loading areas.
 - e. Paved outdoor spaces.
 - f. Signs.
 - g. Exterior lighting, compliant with Hawaii Revised Statute §201-8.5 Night Sky Protection Strategy.
 - h. Landscaping.
 - i. Generators.
 - j. Transportation flow such as restriping, new signage, redirecting traffic flow, altering the number of parking spots and complying with the Americans with Disabilities Act (ADA) requirements.
 - k. Fuel and generator systems for the operation of healthcare related operations.
 - l. Existing helicopter landing pads
 - m. Vector and pest control.
 - n. Removal or treatment of hazardous substances.

Type 2. Replacement or reconstruction of existing structures and facilities where the new structure will be located generally on the same site and will have substantially the same purpose, capacity, density, height, and dimensions as the structure replaced, including but not limited to:

1. Furniture.
2. Equipment.
3. Electrical system
4. Communications system.
5. Plumbing system.
6. Generators.
7. Water Storage.
8. Heating, ventilation, and air conditioning system.
9. Walls and fences.
10. Signs.
11. Existing healthcare facilities, including hospital units, hospital or long term care rooms, cafeterias, shower rooms, laundry facilities, administrative offices, meeting rooms, dwelling units, gathering spaces.
12. Existing on site structures such as covered walkways, covered gathering areas, flagpoles, parking lots, turnarounds.
13. On-site fuel and generator systems.
14. Existing waste treatment facilities where the County does not have any off-site sewage system available.
15. Existing walkways.

16. Existing roadways, including repaving and striping.
17. Existing parking lots.
18. Existing helicopter landing pads

Type 3. Construction and location of single, new, small facilities or structures and the alteration and modification of the facilities or structures and installation of new, small equipment or facilities and the alteration and modification of the equipment or facilities.

1. Workforce affordable housing units that meet the limitations laid out in (11-200.1-15(c)(3)(A) and (B).
2. Buildings and structures within an existing HHSC property used by HHSC that does not require any off-site infrastructure improvements such as tool sheds, administrative offices, temporary structures to conduct imaging services, security rooms, parking lots, portable structures.
3. Accessory or appurtenant structures including stairs, lifts, elevators, ramps, steps, railings, handrails, curbs, curb cuts, and improvements for compliance with the Americans with Disabilities Act (ADA); lanais, courtyards, pergolas, shaded areas with benches, walls, gates, fences, retaining walls, bike racks signage, posts, painting and water proofing, plaques, art installations.
4. Systems and equipment including all fire protection systems, telephone and communication equipment, backflow preventers, sewage and water systems, cesspools, leach fields septic systems, tanks, injection wells, utility boxes, valves, piping, water mains, meters, irrigation systems, plumbing fixtures, electrical, power, and light systems including emergency generators, electrical transformers, drainage collection and distribution systems, heating, ventilation and air conditioning (HVAC) systems, telecommunication systems, conveying systems and roofing systems.
5. All projects that are required to bring HHSC into compliance with State, Federal, County regulations and requirements from healthcare accrediting bodies.
6. Renewable power equipment and systems including photovoltaic and solar systems and vehicle charging stations

Type 4. Minor alterations in the conditions of land, water, or vegetation.

1. Clearing and grubbing or grading in accordance with the State Department of Health and County standards.
2. Landscaping work, including, but not limited to: topsoil installation, planting trees, plants and ground cover, and relocation or removing vegetation and trees that are not considered historical or significant, provided that it complies with all laws, regulations, ordinances, codes and rules.
3. Establish temporary or permanent vegetative cover for soil stabilization.
4. Installation of sprinkler or irrigation system to water trees, plants and grass.
5. Minor alteration of walls and fences.
6. Minor erosion control, slope stabilization, slope embankments and construction methods for retaining walls up to six (6) feet of earth retention for 1,000 linear feet or less.

7. Land subdivision and consolidation for a site related to healthcare services, including easements in favor of the State, County or public utility company for on-site infrastructure improvements.

Type 5. Basic data collection, research, experimental management, and resource and infrastructure testing and evaluation activities that do not result in a serious or major disturbance to an environmental resource, including but not limited to:

1. Topographic surveys.
2. Soil borings/foundation surveys.
3. Traffic surveys.
4. Air/water/noise/hazardous materials assessment and/or monitoring survey.
5. Drainage study.
6. Economic analysis.
7. Long range development plans.
8. Environmental impact research.
9. Archaeological surveys, reconnaissance, and data recovery.
10. Site appraisal to determine costs for lease agreements.
11. Right of Entry for site investigation/study.
12. Site appraisals to determine the fair market value of real property.

Type 6. Demolition of structures, except those structures that are listed on the national register or Hawaii Register of Historic Places.

1. Buildings that do not have historic character, scenic value, community value.
2. Infrastructure systems such as utilities (e.g. water, drainage, sewer, power, telephone, data, and communication systems).
3. Structures such as covered walkways, covered play courts, bus shelters, swimming pools, bleachers, scoreboards, stairs, ramps, elevators, flag poles, walls, fences, planter boxes, signs, garages, patios, storage sheds, portable buildings, pump houses, transformer buildings, and air conditioning enclosures.
4. Structures or facilities such as roads, parking lots, walls, fences, signs, flag poles, paved courts, walkways, equipment, and furniture.
5. Any related improvement or work that is limited to the HHSC facility site.

Type 7. Zoning variances except shoreline setback variances:

1. Zoning variances for building setbacks.
 - a. Residential buildings, dwelling units and ancillary structures
 - b. Office and maintenance buildings, storage buildings
 - c. Parking garages and structures
 - d. Retaining walls and slope stabilization structures
2. Zoning variances for site improvements
3. Zoning variances for infrastructure and utilities

Type 8. Continuing administrative activities, including but not limited to:

1. Purchases of supplies, services, and equipment required to support existing operations.
2. Procure professional services, goods and services, competitive sealed proposals, competitive sealed bidding, and similar services.
3. Request and use federal, state, or local grants to support ongoing operations; implement programs, training of personnel, including purchase and rental of facilities and equipment and similar activities.
4. Perform all aspects of administrative functions, including those statutorily mandated by HRS 323F, including personnel actions, accounting, budgeting, training, regulatory reporting, and the promulgation of policies and similar activities.
5. Conduct research, outreach, and communications; prepare long term planning documents and similar activities.
6. Prepare and administer agreements with vendors and contractors.
7. Right of entry agreements, use and occupancy agreements, lease agreements, license agreements, workforce housing agreements.
8. Acquisition, subdivision, or consolidation of lands, including public lands from other agencies through Governor's executive orders or other legal instruments.

Type 9. Acquisition of land and existing structures, including single or multi-unit dwelling units, for the provision of affordable housing, involving no material change of use beyond previously existing uses, and for which the legislature has appropriated or otherwise authorized funding.

1. Workforce affordable housing units that meet the limitations laid out in (11-200.1-15(c)(3)(A) and (B).

PART 2 ACTIONS

Pursuant to §11-200.1-16(c) Hawaii Administrative Rules (HAR), HHSC considers the following activities listed under Part 2 to be exempt from the preparation of an EA, provided that HHSC files an exemption notice meeting the requirements set forth in HAR §11-200.1-17 and chapter 343, Hawaii Revised Statutes (HRS).

The types of activities include, but are not limited to, those that fall within one or more of the ten (10) general types of actions established under HAR §11-200.1-15(c) of actions eligible for the exemptions.

Type 3. Construction and location of single, new, small facilities or structures and the alteration and modification of the facilities or structures and installation of new, small equipment or facilities and the alteration and modification of the equipment or facilities, including, but not limited to:

- (A) Single-family residences less than 3,500 square feet, as measured by the controlling law under which the proposed action is being considered, if not in conjunction with the building of two or more such units;
- (B) Multi-unit structures designed for not more than four dwelling units if not in

- conjunction with the building of two or more such structures;
- (C) Stores, offices, and restaurants designed for total occupant load of twenty individuals or fewer per structure, if not in conjunction with the building of two or more such structures; and
- (D) Water, sewage, electrical, gas, telephone, and other essential public utility services extensions to serve such structures or facilities; accessory or appurtenant structures including garages, carports, patios, swimming pools, and fences; and, acquisition of utility easements:
1. Replacement or reconstruction of structures without a historic significance determination that result in an increase of more than 20% of the square footage of the structure.
 2. Workforce affordable housing units that meet the limitations laid out in (11-200.1-15(c)(3)(A) and (B).
 3. New helicopter landing pads to service emergency transports to and from the hospitals.

Type 10. New construction of affordable housing, where affordable housing is defined by the controlling law applicable for the state or county proposing agency or approving agency, that meets the following:

- (A) Has the use of state or county lands or funds or is within Waikiki as the sole triggers for compliance with chapter 343, HRS;
- (B) As proposed conforms with the existing state urban land use classification;
- (C) As proposed is consistent with the existing county zoning classification that allows housing; and
- (D) As proposed does not require variances for shoreline setbacks or sitting in an environmentally sensitive area, as stated in section 11-200.1-13(b)(II)
1. Workforce affordable housing units that meet the limitations laid out in (11-200.1-15(c)(3)(A) and (B).