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DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU



Attorneys for Intervenor

SCHNITZER STEEL HAWAII CORP.

BEFORE THE PLANNING COMMISSION
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAII

In the Matter of the Application of

DEPARTMENT OF ENVIRONMENTAL
SERVICES, CITY AND COUNTY OF
HONOLULU

Application to Modify SUP No. 2008/SUP-2
(SP09-403) by Modifying (1) Condition No. 1
of the Planning Commission's Findings of
Fact, Conclusions of Law, and Decision and
Order, dated June 10, 2019, and (2) Condition
No. 5 of the LUC's Findings of Fact,
Conclusions of Law, and Decision and Order
Approving with Modifications the City and
County of Honolulu Planning Commission's
Recommendation to Approve Special Use
Permit, certified on November 1, 2019

FILE NO. 2008/SUP-2
LUC DOCKET NO. SP09-403

INTERVENOR SCHNITZER STEEL
HAWAII CORP.'S **MOTION FOR
ENLARGEMENT OF TIME;**
CERTIFICATE OF SERVICE

HEARING:

Date: June 28, 2023

Time: 1:30 p.m.

**INTERVENOR SCHNITZER STEEL HAWAII CORP.'S
MOTION FOR ENLARGEMENT OF TIME**

Schnitzer Steel Hawaii Corp. ("Schnitzer"), by and through its attorneys, WATANABE
ING LLP, respectfully moves the Honolulu Planning Commission to approve Schnitzer's request


for an enlargement of time until Tuesday, June 13, 2023, for the filing of Schnitzer's Motion to Intervene. This request for an enlargement of time is being filed in an abundance of caution. Pursuant to the Notice of Public Hearing ("Notice") published in the Honolulu Star-Advertiser on Monday, May 29, 2023, "any person or agency wishing to intervene as a party in the proceeding shall file a petition with the Commission within fourteen (14) days after this notice is published in the Honolulu Star-Advertiser." Monday, June 12, 2023, Kamehameha Day, marked fourteen days from the Notice of Public Hearing. However, Rules of the Planning Commission ("Planning Commission Rules") §2-16 regarding computation of time provides as follows:

"In computing any period time under the rules herein, **by notice**, or by any order or rule of the commission, the time begins with the day following the act, event, or default, and includes the last day of the period **unless it is a Saturday, Sunday, or legal Holiday in which event the period runs until the end of the next day which is not a Saturday, Sunday, or legal holiday**. When the prescribed period of time is ten (10) calendar days or less, Saturdays, Sundays, or holidays within the designated period shall be excluded in the computation."

See Planning Commission Rule § 2-16. (Emphasis added).

Monday, June 12, 2023, Kamehameha Day was a State Holiday. Accordingly, pursuant to Planning Commission Rule § 2-16, the fourteen-day period runs until Tuesday, May 13, 2023. Schnitzer will be concurrently filing its Motion to Intervene on Tuesday, June 13, 2023 and therefore reiterates that this request has been brought out of an abundance of caution. For the foregoing reasons, Schnitzer respectfully requests that the Planning Commission grant an enlargement of time until June 13, 2023, for Schnitzer to file its Motion to Intervene if it deems Monday, June 12, 2023, to be the end of the fourteen-day filing period.

DATED: Honolulu, Hawai'i, June 13, 2023.



IAN L. SANDISON
JOYCE W.Y. TAM-SUGIYAMA
RIHUI YUAN
Attorneys for Intervenor
SCHNITZER STEEL HAWAII CORP.

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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was duly served
upon the parties identified below on the date set forth below:

DEPARTMENT OF ENVIRONMENTAL SERVICES (via Certified Mail)
City and County of Honolulu
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

DEPARTMENT OF PLANNING AND PERMITTING (Hand Delivery)
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

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DEPARTMENT OF ENVIRONMENTAL SERVICES,
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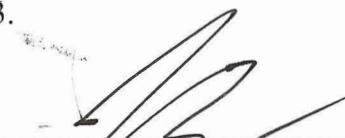
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Attorney for Intervenor
OFFICE OF PLANNING, STATE OF HAWAII

DATED: Honolulu, Hawai'i, June 13, 2023.



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SCHNITZER STEEL HAWAII CORP.