

In The Matter Of:

*Department of Natural Resources & Environmental Control
Proposed Revisions to 7 DE Admin. Code 1140*

*Public Hearing
February 21, 2019*

*Wilcox & Fetzer, Ltd.
1330 King Street
Wilmington, DE 19801
email: depos@wilfet.com, web: www.wilfet.com
phone: 302-655-0477, fax: 302-655-0497*



DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Public Hearing Regarding)
Proposed Revisions to)
7 DE Admin. Code 1140 to update)
to the adoption by reference of)
California's Low Emission)
Vehicle (LEV) III and the)
Greenhouse Gas (GHG) Standards.)

.. . . .

DNREC Richardson & Robbins Building
89 Kings Highway
Dover, Delaware 19901

Thursday, February 21, 2019
6:10 p.m.

.. . . .

BEFORE: Lisa Vest, Hearing Officer

PRESENTING: Ajo Rabemiarisoa

-- Transcript of Proceedings --

WILCOX & FETZER
1330 King Street
Wilmington, DE 19801
(302) 655-0477
www.wilfet.com



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

TABLE OF CONTENTS

	Page
Introduction by Ms. Vest	3
Introduction by the Division	4
Exhibits 1 - 11 Admission	8
Public Comments:	
Don Brill	9
Sherry Marsico	12
Conclusory Remarks by Ms. Vest.	12
Certificate of Reporter	14

1 MS. VEST: The time is now 6:10 p.m.
2 on Thursday, February 21, 2019. And after a
3 ten-minute delay, we are going to go ahead and begin
4 these proceedings.

5 The record should reflect that we did
6 wait an additional ten minutes because there was
7 some expectation that others might be coming. But
8 at this point we are just going to proceed with the
9 people that are here at this point.

10 We are here tonight to provide a
11 platform for the public to come and offer comment,
12 if they wish to do so, regarding the Department's
13 Proposed Revisions to 7 Delaware Admin Code 1140,
14 which is to adopt by reference the California
15 Low-Emission Vehicle, or LEV III, and Greenhouse Gas
16 Standards.

17 For those of you that do not know me,
18 my name is Lisa Vest. And Secretary Garvin has
19 appointed me to serve as hearing officer for these
20 proceedings.

21 A little protocol for tonight, and
22 then we will just go ahead and get to it.

23 After these opening remarks, I will
24 turn it over to Department staff. They have a brief



1 statement for the record and, I believe, some
2 exhibits to get entered in.

3 At that point we will open the floor
4 up to anyone present that wishes to offer comment
5 for the record.

6 It should be noted that all comment,
7 whether received verbally tonight at the hearing or
8 via e-mail or handwritten, received in the mail, all
9 bears the same weight. And as long as it all comes
10 in during the period that the comment period is open
11 for, it will all be incorporated into the hearing
12 record and considered by the Secretary prior to his
13 making a decision in this matter.

14 To that end, it should also be noted
15 that the record for comment will not close tonight.
16 Pursuant to Delaware law, it will remain open for a
17 full 15 days following tonight's hearing. So, as
18 long as comment is received on or before close of
19 business on Friday, March 8th, it will all bear the
20 same weight, and it will all be taken into
21 consideration.

22 That being said, I will turn the
23 floor over to Department staff for their brief
24 statement.



1 MS. RABEMIARISOA: All right. So
2 good evening, everyone. Can you hear me fine?

3 So my name is Ajo Rabemiarisoa. I'm
4 an environmental engineer working for the Planning
5 Section of the Division of Air Quality at DNREC.
6 And I'm the leading staff for today's proposed
7 regulations, amendments.

8 And here is the Department's
9 statement:

10 On August 24, 2018, the Environmental
11 Protection Agency and the National Highway Traffic
12 Safety Administration have proposed to roll back the
13 Greenhouse Gas Emissions Standards and freeze the
14 fuel economy standards for light-duty vehicles to
15 the currently adopted 2020 standards for model years
16 2021 to 2026, through their Safer Affordable Fuel
17 Efficient (or SAFE) vehicles rule.

18 If adopted, the SAFE rule would
19 result in an estimated increase of 1,432 million
20 metric tons of greenhouse gases emissions in the
21 atmosphere by 2035.

22 In the light of this proposed rule,
23 the California Air Resources Board amended their
24 California Code of Regulations, Sections 1961.2 and



1 1961.3, to clarify that the "deemed to comply"
2 provision embedded in California's Advance Clean Car
3 program is only applicable with the currently
4 adopted Federal Standards, as last amended on
5 October 25, 2016. The California amendments are
6 effective as of December 12, 2018.

7 The "deemed to comply" provision was
8 first adopted by California predicating that the
9 U.S. EPA standards are providing greenhouse gas
10 emissions reduction equivalent to the California
11 standards.

12 Now, in order to maintain the
13 emissions stringency of the currently adopted
14 standards, Delaware needs to clarify that the
15 "deemed to comply" provision only holds true with
16 the Federal Standards, as they exist as of
17 October 25, 2016.

18 The Department believes that the
19 currently adopted emissions standards will offer
20 Delawareans an increased quality of life through
21 increased economic opportunities, reduced local air
22 pollution, and an opportunity to mitigate the
23 effects of climate change on our coastal state.

24 As demonstrated in California's final



1 statement of reasons for their respective
2 rulemaking, the currently adopted greenhouse gas
3 emissions standards remain appropriate,
4 cost-effective, and technologically feasible for
5 model years 2021 through 2025.

6 In order to maintain emissions
7 standards identical to California's standards, as
8 required by Section 177 of the Clean Air Act, the
9 Department needs to adopt California's latest
10 amendments into its Low Emission Vehicle program.

11 On December 27, 2018, Secretary
12 Garvin signed an emergency order to maintain the
13 emissions stringency of the currently adopted
14 standards, beginning with model year 2021.

15 Today, we are proposing to preserve
16 the emissions stringency for the 2021 through 2025
17 model year standards. To do so, the Department is
18 proposing to amend 7 Delaware Admin Code 1140,
19 Delaware Low Emission Vehicle program, by
20 incorporating by reference the effective date of
21 California's amendments to 13CCR 1961.2 and 1961.3,
22 thus clarifying the Deemed to Comply provision.

23 The Department is presenting 11
24 exhibits, as provided herein the exhibits listing,



1 which is also available to you on the table in the
2 back of the room.

3 MS. VEST: Thank you. Let the record
4 reflect that the 11 exhibits provided to me by the
5 Department staff now are hereby entered into the
6 formal hearing record being generated in this
7 matter.

8 Does the Department have anything
9 additional that they wish to add for the record at
10 this time?

11 MS. RABEMIARISOA: Nothing. Thank
12 you.

13 MS. VEST: Okay. Thank you.

14 At this point I will open the floor
15 up to anyone wishing to offer comment. I'm just
16 going on the sign-up sheet that was in back of the
17 room.

18 And, accordingly, Mr. Don Brill, you
19 are up. And if you have any statement -- if you
20 have anything written that you would like to be
21 formally entered into the record, I can take that,
22 as well.

23 MR. BRILL: I don't think I do.

24 MS. VEST: Okay.



1 MR. BRILL: Maybe could I make some
2 hand changes?

3 MS. VEST: Or you could e-mail it to
4 me later.

5 MR. BRILL: Yeah, I will e-mail it.

6 MS. VEST: That's fine.

7 MR. BRILL: Do you need name and
8 address?

9 MS. VEST: I just need you to spell
10 your full name for the court reporter.

11 MR. BRILL: Don Brill, B-R-I-L-L.

12 So I am here on behalf of Delaware
13 Chapter of the Sierra Club. And I can see we have a
14 large audience. (Laughter)

15 But I first want to just say that we
16 thank the Governor, his administration, for doing
17 that emergency act to make sure that we stayed with
18 California.

19 So now we need that amendment now
20 added to the regulations.

21 So our director of the Delaware
22 Sierra Club, Sherri Evans-Stanton, prepared a short
23 notice for me to read to the group.

24 MS. VEST: Proceed.



1 MR. BRILL: Delaware is uniquely
2 situated because of its low elevation, and it will
3 be significantly impacted by sea level rise and
4 climate change.

5 The transportation sector is a major
6 source of air pollution and greenhouse gases.

7 Children and adults with asthma and
8 other chronic health conditions like heart disease
9 and lung disease are particularly sensitive to ozone
10 pollution.

11 Aggressive policy initiatives must be
12 put in place. As a partner in the U.S. Climate
13 Alliance, Delaware needs to incorporate policy
14 initiatives such as promoting the electrification of
15 vehicles, including buses, continuing state rebates
16 for the purchase of EVs -- these are electric
17 vehicles -- increasing EV charging stations,
18 defending clean car standards, and working on local
19 clean transportation solutions.

20 With the current rollback of many
21 federal policies designed to protect our air and
22 water quality, it is more urgent than ever that the
23 states take an aggressive position of protecting air
24 quality.



1 While our ultimate goal is for
2 Delaware to move towards the zero emission mandate,
3 we commend DNREC for the proposed amendments to meet
4 a higher standard in Delaware's air regulations.

5 The adoption by reference of
6 California's Low Emission Vehicle 3 and the
7 Greenhouse Gas Standards are a critical step in
8 reducing greenhouse gases.

9 These amendments include more
10 stringent emission standards for both criteria
11 pollutants and greenhouse gases for new passenger
12 vehicles.

13 We urge you to adopt these proposed
14 amendments.

15 And that was from Sherri
16 Evans-Stanton, the Director of Delaware Sierra Club.
17 (Applause) Thank you.

18 MS. VEST: Thank you, Mr. Brill. Is
19 there anyone else here present this evening that
20 wishes to offer comment. Yes, ma'am? Could you
21 stand? And it's a small group, so you don't have to
22 come forward.

23 MS. MARSICO: Thank you.

24 MS. VEST: But if you could say your



1 full name and spell your last name for the court
2 reporter.

3 MS. MARSICO: Sherry Marsico,
4 M-A-R-S-I-C-O. I also want to commend Delaware in
5 joining with California in their climate alliance.

6 I think it is very important to start
7 taking action. And I believe that the proof that we
8 can all see: After a snowfall, you go outside. The
9 first day, the snow is all nice and white. The
10 second, third day, the snow is gray. Four days,
11 it's black. We breathe that in. We can't see it
12 without snow, but it's there. So let's do something
13 about it. Go Delaware. Thank you.

14 MS. VEST: Thank you, ma'am. Anyone
15 else that wishes to offer comment?

16 I want to thank everybody for taking
17 time out of their busy schedules to come tonight.
18 As I said at the beginning of these proceedings, the
19 record does not close with respect to comment at the
20 conclusion of these proceedings.

21 Pursuant to Delaware law, the record
22 will remain open for another 15 days. And all
23 comment bears the same weight, whether it comes in
24 tonight verbally at the hearing, or whether I



1 receive it by e-mail, or it comes in snail mail,
2 United States Postal mail.

3 As long as it's received by the
4 Department in writing on or before close of business
5 on March 8th, it will all bear the same weight, and
6 it will all be taken into consideration.

7 I want to thank everybody again for
8 coming. Since there are no more comments, this
9 hearing is adjourned.

10 (Concluded at 6:23 p.m.)

11

12

13

14

15

16

17

18

19

20

21

22

23

24



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 22nd day of February 2019.



Lorena J. Hartnett
Registered Professional Reporter

A	Agency (1) 5:11	10:7	brief (2) 3:24 4:23
accordingly (1) 8:18	Aggressive (2) 10:11,23	atmosphere (1) 5:21	Brill (9) 8:18,23 9:1,5,7,11, 11 10:1 11:18
Act (2) 7:8 9:17	ahead (2) 3:3,22	audience (1) 9:14	B-R-I-L-L (1) 9:11
action (1) 12:7	Air (8) 5:5,23 6:21 7:8 10:6,21,23 11:4	August (1) 5:10	buses (1) 10:15
add (1) 8:9	Ajo (1) 5:3	available (1) 8:1	business (2) 4:19 13:4
added (1) 9:20	Alliance (2) 10:13 12:5	B	busy (1) 12:17
additional (2) 3:6 8:9	also (3) 4:14 8:1 12:4	back (3) 5:12 8:2,16	C
address (1) 9:8	amend (1) 7:18	bear (2) 4:19 13:5	California (8) 3:14 5:23,24 6:5,8, 10 9:18 12:5
adjourned (1) 13:9	amended (2) 5:23 6:4	bears (2) 4:9 12:23	California's (6) 6:2,24 7:7,9,21 11:6
Admin (2) 3:13 7:18	amendment (1) 9:19	before (2) 4:18 13:4	Car (2) 6:2 10:18
Administration (2) 5:12 9:16	amendments (7) 5:7 6:5 7:10,21 11:3,9,14	begin (1) 3:3	change (2) 6:23 10:4
adopt (3) 3:14 7:9 11:13	another (1) 12:22	beginning (2) 7:14 12:18	changes (1) 9:2
adopted (8) 5:15,18 6:4,8,13,19 7:2,13	anyone (4) 4:4 8:15 11:19	behalf (1) 9:12	Chapter (1) 9:13
adoption (1) 11:5	anything (2) 12:14	being (2) 4:22 8:6	charging (1) 10:17
adults (1) 10:7	Applause (1) 11:17	believe (2) 4:1 12:7	Children (1) 10:7
Advance (1) 6:2	applicable (1) 6:3	believes (1) 6:18	chronic (1) 10:8
Affordable (1) 5:16	appointed (1) 3:19	black (1) 12:11	clarify (2) 6:1,14
after (3) 3:2,23 12:8	appropriate (1) 7:3	Board (1) 5:23	clarifying (1) 7:22
again (1) 13:7	asthma (1)	both (1) 11:10	Clean (4)
		breathe (1) 12:11	

6:2 7:8 10:18,19 climate (4) 6:23 10:4,12 12:5 close (4) 4:15,18 12:19 13:4 Club (3) 9:13,22 11:16 coastal (1) 6:23 Code (3) 3:13 5:24 7:18 come (3) 3:11 11:22 12:17 comes (3) 4:9 12:23 13:1 coming (2) 3:7 13:8 commend (2) 11:3 12:4 comment (11) 3:11 4:4,6,10,15,18 8:15 11:20 12:15,19, 23 comments (1) 13:8 comply (4) 6:1,7,15 7:22 Concluded (1) 13:10 conclusion (1) 12:20 conditions (1) 10:8 consideration (2) 4:21 13:6 considered (1) 4:12 continuing (1) 10:15 cost-effective (1)	7:4 could (4) 9:1,3 11:20,24 court (2) 9:10 12:1 criteria (1) 11:10 critical (1) 11:7 current (1) 10:20 currently (6) 5:15 6:3,13,19 7:2, 13 D date (1) 7:20 day (2) 12:9,10 days (3) 4:17 12:10,22 December (2) 6:6 7:11 decision (1) 4:13 deemed (4) 6:1,7,15 7:22 defending (1) 10:18 Delaware (14) 3:13 4:16 6:14 7:18, 19 9:12,21 10:1,13 11:2,16 12:4,13,21 Delawareans (1) 6:20 Delaware's (1) 11:4 delay (1)	3:3 demonstrated (1) 6:24 Department (9) 3:24 4:23 6:18 7:9, 17,23 8:5,8 13:4 Department's (2) 3:12 5:8 designed (1) 10:21 director (2) 9:21 11:16 disease (2) 10:8,9 Division (1) 5:5 DNREC (2) 5:5 11:3 Don (2) 8:18 9:11 during (1) 4:10 E economic (1) 6:21 economy (1) 5:14 effective (2) 6:6 7:20 effects (1) 6:23 Efficient (1) 5:17 electric (1) 10:16 electrification (1) 10:14 elevation (1)	10:2 else (2) 11:19 12:15 e-mail (4) 4:8 9:3,5 13:1 embedded (1) 6:2 emergency (2) 7:12 9:17 Emission (5) 7:10,19 11:2,6,10 Emissions (9) 5:13,20 6:10,13,19 7:3,6,13,16 end (1) 4:14 engineer (1) 5:4 entered (3) 4:2 8:5,21 environmental (2) 5:4,10 EPA (1) 6:9 equivalent (1) 6:10 estimated (1) 5:19 EV (1) 10:17 Evans-Stanton (2) 9:22 11:16 evening (2) 5:2 11:19 ever (1) 10:22 everybody (2) 12:16 13:7 everyone (1) 5:2
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

EVs (1) 10:16	5:14,16	5:2	6:20,21
exhibits (4) 4:2 7:24,24 8:4	full (3) 4:17 9:10 12:1	hearing (7) 3:19 4:7,11,17 8:6 12:24 13:9	increasing (1) 10:17
exist (1) 6:16	G	heart (1) 10:8	initiatives (2) 10:11,14
expectation (1) 3:7	Garvin (2) 3:18 7:12	hereby (1) 8:5	J
F	Gas (5) 3:15 5:13 6:9 7:2 11:7	herein (1) 7:24	joining (1) 12:5
feasible (1) 7:4	gases (4) 5:20 10:6 11:8,11	higher (1) 11:4	L
February (1) 3:2	generated (1) 8:6	Highway (1) 5:11	large (1) 9:14
Federal (3) 6:4,16 10:21	goal (1) 11:1	holds (1) 6:15	last (2) 6:4 12:1
final (1) 6:24	going (3) 3:3,8 8:16	I	later (1) 9:4
fine (2) 5:2 9:6	good (1) 5:2	identical (1) 7:7	latest (1) 7:9
first (3) 6:8 9:15 12:9	Governor (1) 9:16	III (1) 3:15	Laughter (1) 9:14
floor (3) 4:3,23 8:14	gray (1) 12:10	impacted (1) 10:3	law (2) 4:16 12:21
following (1) 4:17	Greenhouse (9) 3:15 5:13,20 6:9 7:2 10:6 11:7,8,11	important (1) 12:6	leading (1) 5:6
formal (1) 8:6	group (2) 9:23 11:21	include (1) 11:9	LEV (1) 3:15
formally (1) 8:21	H	including (1) 10:15	level (1) 10:3
forward (1) 11:22	hand (1) 9:2	incorporate (1) 10:13	life (1) 6:20
Four (1) 12:10	handwritten (1) 4:8	incorporated (1) 4:11	light (1) 5:22
freeze (1) 5:13	health (1) 10:8	incorporating (1) 7:20	light-duty (1) 5:14
Friday (1) 4:19	hear (1)	increase (1) 5:19	Lisa (1) 3:18
fuel (2)		increased (2)	listing (1)

7:24 little (1) 3:21 local (2) 6:21 10:18 long (3) 4:9,18 13:3 Low (4) 7:10,19 10:2 11:6 Low-Emission (1) 3:15 lung (1) 10:9	Maybe (1) 9:1 meet (1) 11:3 metric (1) 5:20 might (1) 3:7 million (1) 5:19 minutes (1) 3:6 mitigate (1) 6:22 model (4) 5:15 7:5,14,17 more (3) 10:22 11:9 13:8 move (1) 11:2 must (1) 10:11	Nothing (1) 8:11 notice (1) 9:23	P
M	N	O	
ma'am (2) 11:20 12:14 mail (3) 4:8 13:1,2 maintain (3) 6:12 7:6,12 major (1) 10:5 make (2) 9:1,17 making (1) 4:13 mandate (1) 11:2 many (1) 10:20 March (2) 4:19 13:5 MARSICO (3) 11:23 12:3,3 M-A-R-S-I-C-O (1) 12:4 matter (2) 4:13 8:7	name (6) 3:18 5:3 9:7,10 12:1,1 National (1) 5:11 need (3) 9:7,9,19 needs (3) 6:14 7:9 10:13 new (1) 11:11 nice (1) 12:9 noted (2) 4:6,14	October (2) 6:5,17 offer (6) 3:11 4:4 6:19 8:15 11:20 12:15 officer (1) 3:19 only (2) 6:3,15 open (5) 4:3,10,16 8:14 12:22 opening (1) 3:23 opportunities (1) 6:21 opportunity (1) 6:22 order (3) 6:12 7:6,12 other (1) 10:8 others (1) 3:7 out (1) 12:17 outside (1) 12:8 over (2) 3:24 4:23 ozone (1) 10:9	particularly (1) 10:9 partner (1) 10:12 passenger (1) 11:11 people (1) 3:9 period (2) 4:10,10 place (1) 10:12 Planning (1) 5:4 platform (1) 3:11 pm (2) 3:1 13:10 point (4) 3:8,9 4:3 8:14 policies (1) 10:21 policy (2) 10:11,13 pollutants (1) 11:11 pollution (3) 6:22 10:6,10 position (1) 10:23 Postal (1) 13:2 predicating (1) 6:8 prepared (1) 9:22 present (2)

4:4 11:19	purchase (1) 10:16	3:12	Safer (1) 5:16
presenting (1) 7:23	Pursuant (2) 4:16 12:21	regulations (4) 5:7,24 9:20 11:4	Safety (1) 5:12
preserve (1) 7:15	put (1) 10:12	remain (3) 4:16 7:3 12:22	said (2) 4:22 12:18
prior (1) 4:12	Q	3:23	same (4) 4:9,20 12:23 13:5
proceed (2) 3:8 9:24	Quality (4) 5:5 6:20 10:22,24	reporter (2) 9:10 12:2	schedules (1) 12:17
proceedings (4) 3:4,20 12:18,20	R	required (1) 7:8	sea (1) 10:3
program (3) 6:3 7:10,19	RABEMIARISOA (3) 5:1,3 8:11	Resources (1) 5:23	second (1) 12:10
promoting (1) 10:14	read (1) 9:23	respect (1) 12:19	Secretary (3) 3:18 4:12 7:11
proof (1) 12:7	reasons (1) 7:1	respective (1) 7:1	Section (2) 5:5 7:8
Proposed (6) 3:13 5:6,12,22 11:3, 13	rebates (1) 10:15	result (1) 5:19	Sections (1) 5:24
proposing (2) 7:15,18	receive (1) 13:1	Revisions (1) 3:13	sector (1) 10:5
protect (1) 10:21	received (4) 4:7,8,18 13:3	right (1) 5:1	sensitive (1) 10:9
protecting (1) 10:23	record (11) 3:5 4:1,5,12,15 8:3, 6,9,21 12:19,21	rise (1) 10:3	serve (1) 3:19
Protection (1) 5:11	reduced (1) 6:21	roll (1) 5:12	sheet (1) 8:16
protocol (1) 3:21	reducing (1) 11:8	rollback (1) 10:20	Sherri (2) 9:22 11:15
provide (1) 3:10	reduction (1) 6:10	room (2) 8:2,17	Sherry (1) 12:3
provided (2) 7:24 8:4	reference (3) 3:14 7:20 11:5	rule (3) 5:17,18,22	short (1) 9:22
providing (1) 6:9	reflect (2) 3:5 8:4	rulemaking (1) 7:2	Sierra (3) 9:13,22 11:16
provision (4) 6:2,7,15 7:22	regarding (1)	S	signed (1) 7:12
public (1) 3:11		SAFE (2) 5:17,18	significantly (1) 10:3

sign-up (1) 8:16	stayed (1) 9:17	7:15	vehicles (5) 5:14,17 10:15,17
situated (1) 10:2	step (1) 11:7	today's (1) 5:6	11:12
small (1) 11:21	stringency (3) 6:13 7:13,16	tonight (6) 3:10,21 4:7,15 12:17,24	verbally (2) 4:7 12:24
snail (1) 13:1	stringent (1) 11:10	tonight's (1) 4:17	VEST (12) 3:1,18 8:3,13,24 9:3,6,9,24 11:18,24
snow (3) 12:9,10,12	sure (1) 9:17	tons (1) 5:20	12:14
snowfall (1) 12:8	T	towards (1) 11:2	via (1) 4:8
solutions (1) 10:19	table (1) 8:1	Traffic (1) 5:11	W
something (1) 12:12	taking (2) 12:7,16	transportation (2) 10:5,19	wait (1) 3:6
source (1) 10:6	technologically (1) 7:4	true (1) 6:15	water (1) 10:22
spell (2) 9:9 12:1	ten (1) 3:6	turn (2) 3:24 4:22	weight (4) 4:9,20 12:23 13:5
staff (4) 3:24 4:23 5:6 8:5	ten-minute (1) 3:3	U	white (1) 12:9
stand (1) 11:21	their (6) 4:23 5:16,23 7:1 12:5,17	ultimate (1) 11:1	wish (2) 3:12 8:9
standard (1) 11:4	there (4) 3:6 11:19 12:12 13:8	uniquely (1) 10:1	wishes (3) 4:4 11:20 12:15
Standards (18) 3:16 5:13,14,15 6:4, 9,11,14,16,19 7:3,7,7, 14,17 10:18 11:7,10	they (4) 3:12,24 6:16 8:9	United (1) 13:2	wishing (1) 8:15
start (1) 12:6	think (2) 8:23 12:6	up (3) 4:4 8:15,19	without (1) 12:12
state (2) 6:23 10:15	third (1) 12:10	urge (1) 11:13	working (2) 5:4 10:18
statement (5) 4:1,24 5:9 7:1 8:19	Thursday (1) 3:2	urgent (1) 10:22	writing (1) 13:4
states (2) 10:23 13:2	thus (1) 7:22	V	written (1) 8:20
stations (1) 10:17	Today (1)	Vehicle (4) 3:15 7:10,19 11:6	Y
			year (2)

7:14,17 years (2) 5:15 7:5	2021 (4) 5:16 7:5,14,16		
Z	2025 (2) 7:5,16		
zero (1) 11:2	2026 (1) 5:16		
1	2035 (1) 5:21		
1,432 (1) 5:19	21 (1) 3:2		
11 (2) 7:23 8:4	24 (1) 5:10		
1140 (2) 3:13 7:18	25 (2) 6:5,17		
12 (1) 6:6	27 (1) 7:11		
13CCR (1) 7:21	3		
15 (2) 4:17 12:22	3 (1) 11:6		
177 (1) 7:8	6		
1961.2 (2) 5:24 7:21	6:10 (1) 3:1		
1961.3 (2) 6:1 7:21	6:23 (1) 13:10		
2	7		
2016 (2) 6:5,17	7 (2) 3:13 7:18		
2018 (3) 5:10 6:6 7:11	8		
2019 (1) 3:2	8th (2) 4:19 13:5		
2020 (1) 5:15			