

7. No intergovernmental agreements for sharing of commitments of road-clearing equipment appear in Applicant's State or county plans.

8. The Evacuation Time Estimate study nowhere assumes extraordinary snow removal requirements.

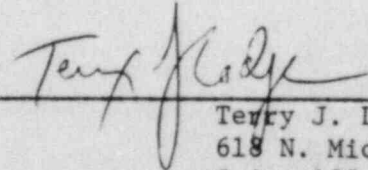
9. Applicant's, State, and county plans reveal no input from county engineers of Lake, Geauga, or Ashtabula counties-yet these elected officials are responsible for snow removal from county highways.

10. Bootstrapping a conclusion into fact, as is attempted by Applicant's Winter's Affidavit, para. 4, does not give substantive evidence to Applicant's belief that road clearance will be easy during a blizzard.

11. Applicant's witnesses include a bachelor of science in law enforcement with 3½ years background in emergency consulting work and an "expert" with only a bachelor of science degree in chemistry, neither of whom displays meteorological expertise.

Respectfully submitted,

By



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