

ECONOMIC IMPACT STATEMENT

Note: In completing the economic impact statement, an agency analyzes and evaluates the anticipated costs and benefits to be expected from adoption of the rule. Rules affecting or regulating public education and public schools must include cost implications to local school districts and taxpayers in the impact statement (see 3 V.S.A. § 832b for details). Where this form is insufficient for your purposes, please use additional sheets.

Please complete the following.

1. Title or subject of rule:
Air Pollution Control Regulations, Subchapter XI, Low Emission Vehicles

2. Agency:
Agency of Natural Resources

3. Please list categories of people, enterprises and government entities potentially affected by this rule and estimate for each the costs and benefits anticipated. If applicable, include small businesses, and complete items 4 and 5 of this sheet as well. Please be as specific as possible, giving full information on your assumptions, data base, and attempts to gather other information on the nature of the costs and benefits involved. Costs and benefits can include any tangible or intangible entities or forces which will make an impact on life without this rule.
See Attachment A

4. Please compare the economic impact of the rule with the economic impact of other alternatives to the rule, including no rule on the subject or a rule having separate requirements for small business.
As described in Attachment A, the proposed amendments are expected to result in net positive impacts. Moreover, adopting these revisions will guarantee that the cleanest cars and most advanced technology vehicles are available for sale to Vermonters, ensure consistency with California's Low Emission Vehicle Program, and guard against allegations that Vermont's regulations do not meet Clean Air Act §177's requirement that Vermont's emission standards be identical to California emission standards. In addition, 10 V.S.A. §579 requires the Agency to adopt a vehicle emissions labeling program and encourages the Agency to adopt California's vehicle labeling program. Thus, in the Agency's view, not adopting the proposed amendments is not a practical alternative. Further, the proposed amendments do not impose any requirements on small businesses.

5. Flexibility statement: Please compare the burden imposed on small business by compliance with the rule to the burden which would be imposed by alternatives considered in 3 V.S.A. § 832a.
The proposed amendments primarily regulate manufacturers of motor vehicles, who are not small businesses in Vermont, and do not impose any reporting or other administrative burdens on small businesses in Vermont. The overall economic impact on small businesses in Vermont is expected to be neutral to positive (see Attachment A).

CERTIFICATION: AS THE ADOPTING AUTHORITY (see 3 V.S.A. § 801(b)(11) for a definition) OF THIS RULE, I CONCLUDE THAT THIS RULE IS THE MOST APPROPRIATE METHOD OF ACHIEVING THE REGULATORY PURPOSE. IN SUPPORT OF THIS CONCLUSION, I HAVE ATTACHED ALL FINDINGS REQUIRED BY 3 V.S.A. § 832a and § 832b

(Sign here)

Date: / /

George Crombie, Secretary
Agency of Natural Resources

(Type name here please)