Economic Impact Statement: Attachment C

The proposed regulation does not impose any reporting or other administrative burdens on small businesses in Vermont. With the exception of gas stations, the economic burden on small businesses is expected to be small but positive. As the GHG standards are phased in, small businesses will have to plan to pay higher prices for vehicles that are subject to the rule. However, the savings in operating costs of these vehicles is expected to outweigh the higher prices of the vehicles. Thus, a small net benefit should be realized.

With respect to small businesses in the gasoline distribution sector, these businesses will be impacted by more fuel efficient cars resulting from the proposed regulation. This impact may be offset to some extent by projected growth in both population and vehicle miles traveled.

Adding flexibility to the proposed rule to mitigate the potential impact to service stations would significantly reduce the effectiveness of the rule in reducing greenhouse gas emissions from motor vehicles. Further, adopting GHG standards that are not identical to those adopted by California would be inconsistent with section 177 of the Clean Air Act. Moreover, the only alternative, which is to accept the default federal emission standards, would compromise the environmental standards of the state and increase the risk to public health, safety, and welfare from motor vehicle GHG emissions.