



Indiana Economic Development Corporation
One North Capitol, Suite 700
Indianapolis, Indiana 46204

Tel: 317.232.8800
Fax: 317.232.4146
www.iedc.in.gov

May 9, 2012

Jennifer Kane
NRC, Division of Hearings
Indiana Government Center-North
100 North Senate Avenue, Room N501
Indianapolis IN 46204-2200

Dear Ms. Kane:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 12-50 and proposed by the Natural Resources Commission ("NRC"). The proposed rule adds 312 IAC 18-3-23 to designate, as pests or pathogens, certain invasive aquatic plants to prohibit the sale, distribution, and transport of these invasive aquatic plants.

The economic impact statement prepared by the NRC indicates that there are approximately 380 licensed nurseries of which less than 12 produce the aquatic plants subject to proposed rule. It also estimates that of the 4,000 retailers of plants, less than 200 sell the species of aquatic plants subject to the proposed rule. In addition, the IURC estimates that 400 small businesses, including marinas and businesses specializing in watercraft repair, removal, and storage, would be subject to the proposed rule. The IURC estimates that for nurseries and retailers, any economic impact will result from disposal of inventory containing the aquatic species subject to the proposed rule. The IURC estimates a total cost for disposal at \$500 per business, assuming each business disposed of 100 plants at a price of \$5 per plant. The economic impact statement indicates that once in compliance, no additional costs would be imposed by the proposed rule. Further, the economic impact statement indicates that the Indiana Department of Natural Resources will engage in outreach to businesses during the rule promulgation process in order to make them aware of the potential changes which could result in reduced purchasing of inventory with the invasive species and, therefore reduced disposal costs. The economic impacts statement indicates that the effect on marinas and businesses specializing in watercraft repair, removal, and storage would potentially amount to \$75 in additional labor costs per month.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 234-3997 or eshields@iedc.in.gov.

Regards,

A handwritten signature in black ink, appearing to read "Eric P. Shields". The signature is fluid and cursive, written over a white background.

Eric P. Shields
Policy Director