



Indiana Economic Development Corporation
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October 19, 2012

Jennifer Kane
Indiana Natural Resources Commission
Indiana Government Center North, Room N501
100 North Senate Avenue
Indianapolis, Indiana 46204

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 12-511 and proposed by the Indiana Natural Resources Commission ("NRC"). The proposed rule adds 312 IAC 18-3-24 pertaining to entomology and plant pathology to regulate a certain beetle and certain fungus that kill walnut trees.

The economic impact statement prepared by the NRC indicates that five or more timber companies will be impacted by the proposed rule. The total annual economic impact is estimated by the NRC to be approximately \$60 per business, which is composed of the administrative costs associated with completing a compliance agreement for Thousand Canker Disease (TCD). The NRC also estimates that the potential loss to the Indiana walnut industry could reach \$800,000,000 (its current estimated value) if the proposed rule is not adopted to protect the trees from disease.

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".

Eric P. Shields
Policy Director