From: HOOFF Rian
To: GOLDSTEIN Meyer
Cc: GILLES Bruce A; ballast2016
Subject: BW rulemaking 2016: AC review of fiscal impact
Date: Thursday, February 18, 2016 17:11:26

Meyer,
The nearly complete fiscal impact statement for BW 2016 is available at:
http://deqsps/programs/rulemaking/lq/ballast2016/docs/fiscal%20impact%20statement.docx

What are the expectations and requirements for presenting this to the Advisory Committee?
Does it need to be read aloud from start to finish?
Should a copy be distributed in advance of our next AC meeting?
I am a bit leery of distributing in advance because I have not yet had an opportunity to explain to them the inclusion of Noise Rule Tables, etc. – would prefer to do so in person, but could draft an email explanation if necessary.

Also, is there any guidance for how to proceed if we present a 'no fiscal impact' finding, but some AC members suggest that there 'could' be an impact. For example, it is conceivable that someone could argue that the proposed rules would result in a delayed voyage time for vessels transiting into Oregon waters and that those costs could have a trickledown effect that could impact some local businesses that rely upon maritime commerce. Alternatively, they may try and suggest that any new regulatory burden could result in fewer vessels opting to deliver their goods to Oregon ports thereby resulting in indirect impacts to the local economy. Suggestions of such hypothetical notions often lack any data for verification.
Can I put the burden on them to provide us with quantifiable data if we are going to incorporate such ideas into our analysis?

Thanks.

Rian

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