

Office of Regulatory Management
Economic Review Form

Agency name	Commonwealth Transportation Board
Virginia Administrative Code (VAC) Chapter citation(s)	24VAC30-92
VAC Chapter title(s)	Secondary Street Acceptance Requirements
Action title	Revision of the Secondary Street Acceptance Requirements (24 VAC 30-92) pursuant to Chapter 425 of the 2022 Acts of Assembly.
Date this document prepared	January 29, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Proposed

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	The proposed changes would add flexibility to the Secondary Street Acceptance Requirements (SSAR) related to the regulation’s connectivity elements. This new flexibility could provide more opportunities for developers to seek exceptions from VDOT from the connectivity requirements. Developers and VDOT are expected to directly benefit through reduced construction and maintenance costs due to the new flexibility, but these benefits cannot be quantified or monetized at this time.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	<p>Non-monetized benefits from the proposed changes accrue to developers through the new opportunities for them to seek exceptions from the regulation’s connectivity requirements. In addition to the cost savings noted above, developers may benefit from the decreased time it could take to complete a project for which they receive an exemption from a connection they would otherwise be required to construct under the status quo.</p> <p>Non-monetized benefits will accrue to localities under the proposed changes. The addition of a new locality-led process for seeking a connectivity exception will provide for more input from localities into the exception process. Communities will also benefit from the addition of vegetation preservation (open space and trees) as a potential reason for a connectivity exception and from the availability for other potential uses property that would have otherwise been needed to create connections.</p> <p>A potential indirect cost of the proposed changes is that any increase in the number of connectivity exceptions granted could result in traffic more heavily relying on the other approved and constructed connection(s) in new subdivisions. This could increase the potential for congestion and a traffic signal or road widening to be needed in the future.</p>	
(5) Information Sources		

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	In order for a subdivision's streets to be accepted by VDOT into the secondary highway system for maintenance, connections to adjacent roadways and connections to adjacent parcels for future development, in compliance with the SSAR, are required. The status quo regulation has less flexibility in its connectivity elements, which results in costs to developers and VDOT associated with constructing and maintaining connections which could be avoided if one or more exceptions under the proposed change was available. However, these costs cannot be quantified or monetized at this time.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	<p>Non-monetized costs under the status quo include the lack of a mechanism for localities to provide input to the connectivity exception process and the potential for subdivision development projects to take longer than they would under the proposed changes. Communities may also accrue costs under the status quo through the use of property for connections which could otherwise be used for other purposes, such as vegetation preservation.</p> <p>A benefit of the status quo is that there are fewer allowable exceptions from the required connectivity provisions, which can help to ensure traffic levels are appropriate on all roads within new subdivisions and potentially decrease the need for traffic signals or road widening in the future.</p>	
(5) Information Sources		

Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	An alternative approach could be to provide fewer new opportunities for connectivity exceptions within the SSAR. For example, the proposed locality-driven exception process could be eliminated. This would potentially still increase the flexibility for connectivity exceptions and decrease the minimum number of connections needed for new subdivision projects, but it would not provide as much flexibility as that included in the current proposal. However, the difference in potential exception requests that could be applied for and granted under this alternative versus the proposed changes cannot be determined.
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	No monetizable direct or indirect costs or benefits to local partners from these proposed changes have been identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	A non-monetizable benefit to localities is the addition of a new locality-led process for seeking a connectivity exception, which will give localities the opportunity to provide VDOT with information to support a connectivity exception request.	
(4) Assistance		
(5) Information Sources		

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	No direct or indirect costs or benefits to families from these proposed changes have been identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(4) Information Sources		

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	No monetizable direct or indirect costs or benefits to small businesses from these changes have been identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	Those developers that are small businesses would directly benefit from these regulatory changes. The proposed changes will allow for more opportunities for developers to request exceptions from the connectivity requirements, potentially leading to a reduction in the minimum required number of connections from new subdivisions to other roads and adjacent properties. However, the number of small businesses affected or	

	the number of connectivity exceptions that may be requested or granted cannot be determined at this time.
(4) Alternatives	
(5) Information Sources	

Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved	Authority of Change	Initial Count	Additions	Subtractions	Net Change
24VAC30-92-10	Statutory:	0			0
	Discretionary:	0			0
24VAC30-92-60	Statutory:	0			0
	Discretionary:	10			0
				Total Net Change of Statutory Requirements:	0
				Total Net Change of Discretionary Requirements:	0

Cost Reductions or Increases (if applicable)

N/A

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden
24VAC30-92-60	The flexibility added to this section will result in more opportunities for developers to request and for VDOT to allow exceptions from required connections to adjacent properties or roads for new developments.	Developers may seek an exception from the SSAR connectivity requirements for conditions such as the presence of an easement for an underground transmission line or a locality desire for vegetation preservation and could potentially realize earlier acceptance of network additions compared to the status quo. These changes provide the potential for developers to have more

		flexibility in meeting connectivity requirements and for maintenance of these roadways and the associated costs to more quickly be transferred from the developer to the Commonwealth.
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Length of Guidance Documents (only applicable if guidance document is being revised)

N/A