

Office of Regulatory Management
Economic Review Form

Agency name	Board of Wildlife Resources
Virginia Administrative Code (VAC) Chapter citation(s)	4 VAC 15-40
VAC Chapter title(s)	Game: In General
Action title	Checking traps; sale of wild turkey parts; feeding deer
Date this document prepared	April 17, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Exempt 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)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: 4VAC15-40-195: This proposal is not anticipated to have any associated direct costs. 4VAC15-40-276: This proposal is not anticipated to have any associated direct costs. 4VAC15-40-285: This proposal is not anticipated to have any associated direct costs.</p> <p>Indirect Costs: 4VAC15-40-195: This proposal is not anticipated to have any associated indirect costs. 4VAC15-40-276: This proposal is not anticipated to have any associated indirect costs. 4VAC15-40-285: This proposal could have some indeterminate indirect costs represented by lost sales of materials sold as deer food (e.g., corn) in the affected cities and towns. No data is available on current sales, though it is anticipated that they are relatively limited due to the city/town nature of the affected localities, limited interest in deer feeding, and a likely current public belief that feeding within these cities and towns is already prohibited by the greater county-scale prohibition that is already in place.</p> <p>Direct Benefits: 4VAC15-40-195: This proposal is not anticipated to have any associated direct benefits. 4VAC15-40-276: This proposal will have direct benefits in an indeterminate amount in allowing expanded sale of nonmeat wild turkey parts. While no data is available, the market for these parts is anticipated to be limited. 4VAC15-40-285: This proposal is not anticipated to have any associated direct benefit.</p> <p>Indirect Benefits: 4VAC15-40-195: This proposal will have indirect benefits in an indeterminate amount in cost savings to those who wish to check traps by camera (savings associated with travel costs and time). 4VAC15-40-276: This proposal is not anticipated to have any associated indirect benefits. 4VAC15-40-285: This proposal will have indirect benefits in an indeterminate amount in reducing potential response costs by the Department to wildlife disease concerns in deer that are promoted by congregation caused by feeding locations and consequent disease spread, as well as promotion of a healthy deer herd and benefits associated with hunting and wildlife watching.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

	(a) Indeterminate	(b) Indeterminate
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: 4VAC15-40-195: The status quo is not anticipated to have any associated direct costs. 4VAC15-40-276: The status quo is not anticipated to have any associated direct costs. 4VAC15-40-285: This status quo is not anticipated to have any associated direct costs.</p> <p>Indirect Costs: 4VAC15-40-195: Indirect costs associated with the status quo include lost cost savings to individuals through continued prohibition of using cameras to check traps (e.g., travel time and costs). No data is available on these costs. 4VAC15-40-276: Indirect costs associated with the status quo include missed sales opportunities for those wishing to sell the enumerated turkey parts. While no data is available, the market for these parts is anticipated to be limited. 4VAC15-40-285: Indirect costs associated with the status quo include potential response costs to the Department associated with wildlife disease response, and any costs associated with additional disease spread among the deer herd (e.g., loss of hunting/viewing opportunities). No data is available as to these costs.</p> <p>Direct Benefits: 4VAC15-40-195: The status quo is not anticipated to have any associated direct benefits. 4VAC15-40-276: The status quo is not anticipated to have any associated direct benefits. 4VAC15-40-285: The status quo is not anticipated to have any associated direct benefits.</p> <p>Indirect Benefits: 4VAC15-40-195: The status quo is not anticipated to have any associated indirect benefits. 4VAC15-40-276: The status quo is not anticipated to have any associated indirect benefits.</p>
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	4VAC15-40-285: The status quo could have indirect benefits in preservation of any existing sales of deer food (e.g., corn) in the affected cities and towns. No data is available on current sales, though it is anticipated that they are relatively limited due to the city/town nature of the affected localities, limited interest in deer feeding, and a likely current public belief that feeding within these cities and towns is already prohibited by the greater county-scale prohibition that is already in place..	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) Indeterminate
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no alternatives to be reasonably considered other than the proposal or the status quo (as to all proposals, all affected activities are either permitted or prohibited; there is no basis for consideration of establishing other regulations that would create alternative or modified conditions). Indirect Costs: N/A Direct Benefits: N/A Indirect Benefits: N/A	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	

(4) Other Costs & Benefits (Non-Monetized)	N/A
(5) Information Sources	N/A

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)	<p>Direct Costs: No section included in this proposal is anticipated to have any impact on local partners.</p> <p>Indirect Costs: No section included in this proposal is anticipated to have any impact on local partners.</p> <p>Direct Benefits: No section included in this proposal is anticipated to have any impact on local partners.</p> <p>Indirect Benefits: No section included in this proposal is anticipated to have any impact on local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	N/A	

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)	<p>Direct Costs: No section included in this proposal is anticipated to have any impact on families.</p> <p>Indirect Costs: No section included in this proposal is anticipated to have any impact on families.</p> <p>Direct Benefits: No section included in this proposal is anticipated to have any impact on families.</p> <p>Indirect Benefits: No section included in this proposal is anticipated to have any impact on families.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	N/A	

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)	<p>Direct Costs: 4VAC15-40-195: This proposal is not anticipated to have any associated direct costs for small businesses. 4VAC15-40-276: This proposal is not anticipated to have any associated direct costs for small businesses. 4VAC15-40-285: This proposal is not anticipated to have any associated direct costs for small businesses.</p> <p>Indirect Costs: 4VAC15-40-195: This proposal is not anticipated to have any associated indirect costs for small businesses. 4VAC15-40-276: This proposal is not anticipated to have any associated indirect costs for small businesses. 4VAC15-40-285: This proposal could have some indeterminate indirect costs represented by lost sales of materials sold as deer food (e.g., corn)</p>
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in the affected cities and towns, some of which may be sold by small businesses. No data is available on current sales, though it is anticipated that they are relatively limited due to the city/town nature of the affected localities, limited interest in deer feeding, and a likely current public belief that feeding within these cities and towns is already prohibited by the greater county-scale prohibition that is already in place.

Direct Benefits: 4VAC15-40-195: This proposal is not anticipated to have any associated direct benefits for small businesses.
 4VAC15-40-276: This proposal will have direct benefits in an indeterminate amount in allowing expanded sale of nonmeat wild turkey parts; sellers of these parts may be small businesses. While no data is available, the market for these parts is anticipated to be limited.
 4VAC15-40-285: This proposal is not anticipated to have any associated direct benefit for small businesses.

Indirect Benefits: 4VAC15-40-195: This proposal will have indirect benefits in an indeterminate amount in cost savings to those who wish to check traps by camera (savings associated with travel costs and time); some of whom may be small businesses (nuisance wildlife control operators).
 4VAC15-40-276: This proposal is not anticipated to have any associated indirect benefits for small businesses.
 4VAC15-40-285: This proposal will have indirect benefits in an indeterminate amount in promotion of a healthy deer herd and benefits associated with hunting and wildlife watching which may inure to small businesses.

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) Indeterminate

(3) Other Costs & Benefits (Non-Monetized)	N/A
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(4) Alternatives	N/A
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(5) Information Sources	N/A
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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	Initial Count	Additions	Subtractions	Net Change
4VAC15-40-195	5	0	1	-1
4VAC15-40-276	0 (the section creates allowances for activity otherwise prohibited by law)	0	1 (additional allowance created)	-1
4VAC15-40-285	3	0	0	0

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
4VAC15-40-195	Allowing use of cameras to check traps	Indeterminate as described above	Indeterminate, but reduced, as described above	Indeterminate
4VAC15-40-276	Allowing sale of certain wild turkey parts	None	None	None
4VAC15-40-285	Prohibition of feeding deer in cities/towns included in localities where deer feeding is currently prohibited due to Chronic Wasting Disease	Indeterminate as described above	Indeterminate as described above	Indeterminate

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

4VAC15-40-195	Allowing use of cameras for checking traps	This proposal would provide convenience and cost savings to those needing to check traps. Some small businesses (nuisance wildlife control operators) would be positively impacted
4VAC15-40-276	Allowing sale of certain wild turkey parts	This proposal would provide business and hobby opportunity to those wishing to sell the enumerated parts or products made from them. Those impacted positively are likely to be small businesses
4VAC15-40-285	Prohibiting feeding of deer in cities and towns contained within counties in which deer feeding is currently prohibited due to Chronic Wasting Disease concerns	This proposal would not require action by any party, but could limit action by those in the affected localities who wish to feed deer for observation or other purposes. Based on the limited areas impacted, and potential current belief by local residents that deer feeding is already prohibited by existing prohibitions applicable to surrounding counties, this impact may be mediated

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Length	New Length	Net Change in Length
N/A			