

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Transportation
Virginia Administrative Code (VAC) Chapter citation(s)	24VAC30-640
VAC Chapter title(s)	Parking on Primary and Secondary Highways
Action title	Adoption
Date this document prepared	4/20/2023
Regulatory Stage (including Issuance of Guidance Documents)	Final Regulation

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>The Virginia Department of Transportation (VDOT) proposes to establish a new regulation to address the parking-related issues of concern to the Department that are not in conflict with localities' authority to regulate parking under other sections of the Code of Virginia. The regulation seeks to clarify the existing practice where parking issues are generally the responsibility of localities and where VDOT's involvement in and action on parking matters will be limited to certain situations.</p> <p>Section 46.2-1223 of the Code of Virginia provides that the Commissioner of Highways may, by regulation, regulate parking on any part of the primary and secondary systems of state highways. No such regulation has yet been established, creating potential confusion over the level of regulatory authority for parking on certain roads. As stated in the proposed regulatory text, VDOT's regulation of parking will not infringe on locality authority to regulate or prohibit parking in accordance with the Code of Virginia.</p> <p>The regulation will serve the purpose of codifying existing VDOT practice related to parking on primary and secondary roads, consistent with the statute which contemplates regulations. VDOT does not anticipate any new direct costs under this regulation that are in addition to those currently borne by VDOT to address parking issues and install associated parking signs. A survey of VDOT residencies statewide indicates parking restrictions are implemented primarily for cases where parking poses a safety or operational issue on state highways. Counties and towns enforce other parking concerns, such as those on subdivision streets.</p> <p>If it is determined that new VDOT signs informing the public of the restrictions on parking, stopping, or standing are needed at a particular location, direct costs would include the cost to VDOT of installing these signs. Parking restriction signs are small (4-6 sq. ft.), and VDOT estimates that at least two new signs could be required at each location where it is determined a prohibition on parking is necessary. The current average cost per sign is \$1,100. Based on current practice and historical data from the VDOT Richmond District Sign Shop, which produces signs for installation on VDOT-maintained highways statewide, an estimated 1,092 signs will be installed annually in the state, at a total annual cost of \$1,201,200.</p> <p>Direct benefits of the installation of parking restriction signs include improved safety for all those who use the highways, more efficient flow of vehicular traffic, and the assurance of proper operation of the highway, all of which are impeded by improper parking, stopping, and</p>
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	standing. VDOT cannot produce estimates for the amount by which safety will be improved or delays to motorists decreased by the regulation and, therefore, cannot make an accurate assessment of the monetized benefit.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$5,666,179	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	<p>Non-monetized direct benefits include the safety improvements for all highway users that result from the potential reduction of accidents attributable to improperly parked vehicles. Average accident costs include: property damage and loss; medical expenses; response by VDOT, first responders, and law enforcement; and accident cleanup. An analysis of crashes on primary and secondary highways for the previous five years indicates there are an average of 107 parking-related crashes annually associated with operational and safety issues. The Virginia Department of Motor Vehicles' (DMV) crash data, which is VDOT's official source for analyzing and monitoring safety on its highways, was utilized to derive this figure. However, it is uncertain if the proposed regulation would have resulted in a reduction of crashes at these locations.</p> <p>Improperly parked vehicles are also known to create traffic delays, and direct non-monetized efficiency benefits of the regulation include the potential reduction of delays to motorists. According to the Texas A&M Transportation Institute (TTI), which is a common source used by VDOT as well as other authorities nationwide to estimate travel delay costs, extra travel time was valued at \$20.17 per person-hour and \$55.24 per truck-hour in 2020. While the monetary unit costs to motorists of traffic delays are known, VDOT cannot estimate the amount by which delays would be reduced at each location where parking might be restricted under this regulation.</p> <p>Non-monetized indirect benefits from the regulation include the improved understanding of VDOT's and localities' authorities regarding parking on Virginia roads. The clarifications provided through the regulation will save time and resources for those involved when a parking issue arises.</p>	

(5) Information Sources	<ul style="list-style-type: none"> • The estimate for the number of signs installed annually is based on data from the VDOT Richmond District Sign Shop, which produces signs for installation on VDOT-maintained highways statewide. The cost of sign installation is based on the “Sign Installation Planning-Level Cost Estimates Fact Sheet, December 2022 Update,” produced by VDOT’s Traffic Operations Division. The total cost of \$1,100 per sign includes the small steel post and foundation to mount the sign as well as the cost of the work to be completed by in-house forces. • The DMV is the official repository and source of the Commonwealth’s crash data and crash reports (FR-300s). • TTI Mobility Division’s 2021 Urban Mobility Report: https://mobility.tamu.edu/umr/media-information/answers-to-many-of-your-questions/
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Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>The regulation intends to codify VDOT’s existing practice regarding parking consistent with the statute which contemplates regulations. Currently, VDOT implements parking restrictions primarily for cases where parking poses a safety or operational issue. Counties and towns enforce other parking concerns, such as those on subdivision streets, through ordinances.</p> <p>As explained in Table 1a, direct costs to install parking restriction signs are borne by VDOT. The current average cost per sign is \$1,100. Under current practice, an estimated 1,092 signs are installed annually statewide, at a total annual cost of \$1,201,200.</p> <p>Direct benefits of the installation of parking restriction signs include improved safety for all those who use the highways, more efficient flow of vehicular traffic, and the assurance of proper operation of the highway, all of which are impeded by improper parking, stopping, and standing. VDOT cannot produce estimates for the amount by which safety is improved or delays decreased by the installation of signs and, therefore, cannot make an accurate assessment of the monetized benefit.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$5,666,179	(b) N/A
(3) Net Monetized Benefit	N/A	

(4) Other Costs & Benefits (Non-Monetized)	<p>As explained in Table 1a, non-monetized direct benefits include the safety improvements for all highway users that result from the potential reduction of accidents attributable to improperly parked vehicles. Improperly parked vehicles are known to create traffic delays, and direct non-monetized efficiency benefits of the regulation also include the potential reduction of delays to motorists.</p> <p>In contrast to the non-monetized indirect benefits described in Table 1a, the status quo will continue to result in a lack of understanding of VDOT's and localities' authorities regarding parking on Virginia roads. Due to the lack of regulatory clarity, VDOT's involvement will continue to be requested in parking issues that are within localities' regulatory authority to resolve. This confusion costs time and resources for those involved.</p>
(5) Information Sources	See "Information Sources" listed in Table 1a.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>An alternative to the proposed regulation would be for VDOT to prohibit parking on all highways unless signs are placed informing the public that parking is allowed in designated areas. This would reverse the present status quo of parking being presumed to be permitted on state highways unless indicated otherwise.</p> <p>Under this alternative, it would be necessary for VDOT to install significantly more signs than under the proposed regulation in order to properly inform the public of the locations where parking, stopping, or standing would be permitted. There are presently 56,416 centerline miles of primary and secondary highways where parking can potentially be regulated and parking-related signs installed. As VDOT's intent is for parking to continue to be permitted on the vast majority of these highways, VDOT would be required to install several signs on every mile of highway in both directions of travel in those areas where parking would continue to be permitted. However, because VDOT cannot estimate all of the locations where signs would need to be installed under this alternative, the total direct monetized costs cannot be determined at this time.</p> <p>Direct benefits of this alternative are estimated to be approximately the same as described in Table 1a.</p>	
(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)	Non-monetized direct benefits from the installation of parking restriction signs include the safety and efficiency improvements for all highway users that will result from the reduction of accidents and delays attributable to improperly parked vehicles. Non-monetized indirect benefits from the regulation of parking would include the improved understanding of VDOT's and localities' authorities regarding parking on Virginia roads. The clarifications provided through a VDOT regulation on this issue will save time and resources for those involved when a parking issue arises.	
(5) Information Sources	See "Information Sources" listed in Table 1a.	

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 costs, indirect costs, direct benefits, or indirect benefits to local partners have been identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	It is anticipated that there will be some amount of increased direct costs to localities for processing parking citations issued pursuant to the regulation. Additional costs would be incurred in the event of contested or delinquent citations, as the locality will be required to issue or cause to be issued complaints, summons, or warrants to the general district court. However, VDOT is unable to estimate the amount of increased costs at this time. Uncontested citations issued under the regulation shall be paid to the administrative official or officials appointed under the provisions of § 46.2-1227 in the locality in which the part of the highway lies, or in localities where there is no appointed administrative official, the citations shall be paid to the local treasurer, who shall promptly pay them into the general fund of the state treasury. For those delinquent or contested	

	citations that have been referred to a court, any sums collected by the court minus court costs will be paid by the court into the general fund of the state treasury.
(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)	No direct costs, indirect costs, direct benefits, or indirect benefits specific to families have been identified.	
(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)	No direct costs, indirect costs, direct benefits, or indirect benefits specific to small businesses have been identified.
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(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) Alternatives	N/A	
(5) Information Sources	N/A	

Changes to Number of Regulatory Requirements

For each individual VAC Chapter amended, repealed, or promulgated by this regulatory action, list (a) the initial requirement count, (b) the count of requirements that this regulatory package is adding, (c) the count of requirements that this regulatory package is reducing, (d) the net change in the number of requirements. This count should be based upon the text as written when this stage was presented for executive branch review. Five rows have been provided, add or delete rows as needed. In the last row, indicate the total number for each column.

Table 5: Total Number of Requirements

Chapter number	Number of Requirements			
	Initial Count	Additions	Subtractions	Net Change
24VAC30-640-10	0	0	0	0
24VAC30-640-20	0	5	0	+5
24VAC30-640-30	0	2	0	+2
24VAC30-640-40	0	4	0	+4
24VAC30-640-50	0	0	0	0

TOTAL	0	11	0	+11
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