

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Virginia Marine Resources Commission
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	4VAC20-270
<b>VAC Chapter title(s)</b>	Pertaining to Blue Crab Fishery
<b>Action title</b>	Annual Updates and Daily Time Limits for Commercial Harvest
<b>Date this document prepared</b>	05/16/2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Final

**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)**

<b>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</b>	<p>These amendments open the blue crab fishery for 2024-2025 and extend the daily time limits for commercial blue crab harvest.</p> <p>Costs: There are no direct or indirect costs.</p> <p>Direct Benefits: Commercial Crab Pot harvesters will have an additional 4 hours (daily fishing opportunity will increase by 33% from an 8-hour daily harvest time limit to a 12-hour daily harvest time limit) to work around any day-specific weather or tide constraints.</p>
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	<p>Indirect Benefits: The time expansion removes the need for additional permits for those seeking either an alternative hour's permit (start the 8-hour day one hour earlier) or a medical exemption permit (start as early as 3am to avoid working during the middle of the day when the sun is at its peak exposure maximum due to a medical condition).</p> <p>The crab pot fishery operates under permit-specific daily bushel limits, and a time expansion provides anglers more flexibility to maximize their efforts to achieve their bushel limits if weather or tide is a limiting factor.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Costs: There would be no direct or indirect costs of status quo as commercial crab harvesters would continue to operate under the same regulations as the past year.</p> <p>Benefits: There would be no direct or indirect benefits of status quo as commercial crab harvesters would continue to operate under the same regulations as the past year.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	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)	None	
(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)	Costs: There would be no direct or indirect costs to local partners. Benefits: There would be no direct or indirect benefits to local partners.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	None	
(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)	Costs: There would be no direct or indirect costs to families.  Benefits: There would be no direct or indirect benefits to families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	None	
(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)	Costs: There would be no direct or indirect costs to small businesses.  Direct Benefits: Most participants in the commercial blue crab fishery can be considered small or independent businesses and they would benefit from the 33% increase in daily fishing opportunity.  Indirect Benefits:	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	None	

(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	Total Net Change in Requirements
4VAC20-270-30	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	-5	-5
4 VAC 20-270 Additional Burden Reduction (see table below)	(M/A):	0	0	0	0
	(D/A):	3	0	0	0
	(M/R):	0	0	0	0
	(D/R):	28	0	-33%	-9
				<b>Grand Total of Changes in Requirements:</b>	(M/A):0 (D/A): 0 (M/R): (D/R): -14

**Key:**

*Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:*

**(M/A):** Mandatory requirements mandated by federal and/or state statute affecting the agency itself

**(D/A):** Discretionary requirements affecting agency itself

**(M/R):** Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

**(D/R):** Discretionary requirements affecting external parties, including other agencies

*Cost Reductions or Increases (if applicable)*

<b>VAC Section(s) Involved</b>	<b>Description of Regulatory Requirement</b>	<b>Initial Cost</b>	<b>New Cost</b>	<b>Overall Cost Savings/Increases</b>
4 VAC 20-270	Daily time limits on harvest			

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

<b>VAC Section(s) Involved</b>	<b>Description of Regulatory Change</b>	<b>Overview of How It Reduces or Increases Regulatory Burden</b>
4 VAC 20-270-30	Expands daily time limit for crab pot fisheries by 33%.	Amends discretionary regulation enacted in 2002 as a harvest effort control measure, which has been supplanted by the implementation of permit specific bushel limits in 2013. Repeals two discretionary add-on permits that would allow for differing daily harvest time limits, which under the proposed regulatory change, would no longer be necessary.