

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Virginia Marine Resources Commission
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	4VAC20-740-10
<b>VAC Chapter title(s)</b>	Pertaining to snagging or towing of fish
<b>Action title</b>	To allow recreational anglers to snag Atlantic menhaden and mullet species in the <i>Mugel</i> genus.
<b>Date this document prepared</b>	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)**

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Changes to this regulation to allow recreational anglers to snag Atlantic menhaden and mullet species in the <i>Mugel</i> genus will have no direct or indirect costs and introduces a snagging definition.</p> <p>Direct Benefits: Allowing recreational anglers to snag Atlantic menhaden and mullet species will allow recreational anglers to catch their own bait when the schools of baitfish are too far to reach with a cast net.</p> <ul style="list-style-type: none"> <li>- \$3,791,625: to estimate this benefit the average number of fishing trips and their associated costs were analyzed, then an estimate was created for the proportion of anglers who prefer to catch their own bait (15%). By calculating the potential savings from this practice and comparing it to the total annual expenditure, the overall impact on annual fishing expenses was derived.</li> </ul> <p>Indirect Benefits: Permitting recreational anglers to snag Atlantic menhaden and mullet species will enable anglers to spend more time targeting their primary species and less time searching for reachable schools of baitfish with a cast net or purchasing bait prior to the fishing trip.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$3,791,625 saved by anglers when they can snag their own baitfish
(3) Net Monetized Benefit	\$ 3,791,625	
(4) Other Costs & Benefits (Non-Monetized)	Anglers will spend less time catching baitfish and more time fishing for their targeted species.	
(5) Information Sources	NOAA’s “The Economic Contribution of Marine Angler Expenditures on Fishing Trips in the United States, 2017”	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Leaving this regulation status quo will retain the estimate \$3,791,625 in costs to recreational anglers that are currently not able to snag their own bait fish.
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	Indirect Costs: Leaving this regulation status quo will have the indirect cost of additional time spent by fishermen catching bait with the currently approved gears and/or purchasing bait prior to the fishing trip.  Keeping this regulation status quo will have no direct or indirect benefit.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$3,791,625 spent by anglers who cannot snag their own baitfish	(b) \$0
(3) Net Monetized Benefit	\$ - 3,791,625.00	
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources	NOAA's "The Economic Contribution of Marine Angler Expenditures on Fishing Trips in the United States, 2017"	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	There were no alternative options considered other than the status quo (listed above).	
(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)	This regulatory change will have no direct or indirect cost to local partners. This regulatory change will have no direct or indirect benefits for 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)	This regulatory change will have no direct or indirect costs for families. This regulatory change will have no direct or indirect benefits for families.	
(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)	This regulatory change will have a net indirect benefit to small fish charter businesses that will now be able to snag their own bait or catch bait more efficiently throughout their trip.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)		
(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
4 VAC 20-740-20	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	(15 % * 2 D/R lines = 0.3 lines reduced)	- 0.3
<b>Grand Total of Changes in Requirements:</b>				(M/A):0	(D/A):0
				(M/R):0	(D/R): -0.3

**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)*

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

*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
4 VAC 20-740-20	Allowing recreational anglers to snag Atlantic menhaden and mullet species in the <i>Mugel</i> genus.	The main method for catching these species is using a cast net as schools swim in large easily identifiable schools close to shore. Large schools are regularly seen swimming further off the shoreline but are too far for a cast net to be thrown. The only method to catch Atlantic menhaden and mullet when they are far from the shoreline is using a weighted treble hook to snag the fish in the body. Allowing recreational anglers, the ability to snag Atlantic menhaden and mullet species will decrease the burden of searching for schools of baitfish close enough to be caught using a cast net. This will increase the amount of time anglers can spend fishing for their targeted species.

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

Title of Guidance Document	Original Length	New Length	Net Change in Length

\*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).