

Office of Regulatory Management
Economic Review Form

Agency name	Commonwealth Transportation Board
Virginia Administrative Code (VAC) Chapter citation(s)	24 VAC 30-91
VAC Chapter title(s)	Subdivision Street Requirements
Action title	Periodic Review
Date this document prepared	12/12/2022

Cost Benefit Analysis

Table 1a must be completed for all actions. Tables 1b and 1c must be completed for actions (or portions thereof) where the agency is exercising discretion, including those where some of the changes are mandated by state or federal law or regulation. Tables 1b and 1c are not needed if **all** changes are mandated, and the agency is not exercising any discretion. In that case, enter a statement to that effect.

- (1) Direct Costs & Benefits: Identify all specific, direct economic impacts (costs and/or benefits), anticipated to result from the regulatory change. (A direct impact is one that affects entities regulated by the agency and which directly results from the regulatory change itself, without any intervening steps or effects. For example, the direct impact of a regulatory fee change is the change in costs for these regulated entities.) When describing a particular economic impact, specify which new requirement or change in requirement creates the anticipated economic impact. Keep in mind that this is the proposed change versus the status quo. One bullet has been provided, add additional bullets as needed.
- (2) Quantitative Factors:
 - (a) Enter estimated dollar value of total (overall) direct costs described above.
 - (b) Enter estimated dollar value of total (overall) direct benefits described above.
 - (c) Enter the present value of the direct costs based on the worksheet.
 - (d) Enter the present value of the direct benefits based on the worksheet.
- (3) Benefits-Costs Ratio: Calculate d divided by c OR enter it from the worksheet.
- (4) Net Benefit: Calculate d minus c OR enter it from the worksheet.
- (5) Indirect Costs & Benefits: Identify all specific, indirect economic impacts (costs and/or benefits), anticipated to result from the regulatory change. (An indirect impact is one that results from responses to the regulatory change, but which are not directly required by the regulation. Indirect impacts of a regulatory fee change on regulated entities could include a change in the prices they charge, changes in their operating procedures or employment levels, or decisions to enter or exit the regulated profession or market. Indirect impacts also include responses by other entities that have close economic ties to the regulated entities, such as suppliers or partners.) If there are no indirect costs or benefits, include a specific statement to that effect.

- (6) Information Sources: Describe the sources of information used to determine the benefits and costs, including the source of the Quantitative Factors. If dollar amounts are not available, indicate why they are not.
- (7) Optional: Use this space to add any further information regarding the data provided in this table, including calculations, qualitative assessments, etc.

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

<p>(1) Direct Costs & Benefits</p>	<p>As a result of the completed periodic review for 24 VAC 30-91, the Commonwealth Transportation Board (CTB) has voted to retain this regulation as-is. At the recommendation of the Office of Regulatory Management (ORM), due to the advanced stage of this periodic review at the time new procedures were issued, this form has been prepared with consideration of the regulation in its current form as the only alternative. Additionally, at the recommendation of ORM, a qualitative analysis of costs and benefits is provided below.</p> <p>The Subdivision Street Requirements (SSR) govern the acceptance of subdivision streets into the secondary system of state highways for maintenance by the Virginia Department of Transportation (VDOT). Streets which may be considered for acceptance in accordance with this regulation include: 1) streets where the street layout has been proffered pursuant to § 15.2-2297, 15.2-2298, or 15.2-2303 of the <i>Code of Virginia</i> if the requirements of 15.2-2307 are met prior to July 1, 2009; 2) streets that are part of a recorded plat or final site plan valid pursuant to § 15.2-2261 of the <i>Code of Virginia</i> and approved in accordance with §§ 15.2-2241 through 15.2-2245 and 15.2-2286 of the <i>Code of Virginia</i> prior to July 1, 2009; 3) streets that are part of a preliminary subdivision plat valid pursuant to § 15.2-2260 of the <i>Code of Virginia</i> approved in accordance with §§ 15.2-2241 through 15.2-2245 and 15.2-2286 of the Code of Virginia prior to July 1, 2009; 4) streets that are part of a street construction plan approved by VDOT prior to July 1, 2009; and 5) if requested by the local governing body, the SSR shall apply if the conceptual sketch was submitted to the agency prior to July 1, 2009.</p> <p>Developers bear the direct costs of preparing and paying the required surety and fees to submit their street plans to VDOT. They also bear the direct cost of constructing their streets to the SSR standards, which may cost more than if they were not constructed to these standards. The direct costs of this regulation to VDOT are the time and resources to review the street plans.</p> <p>Direct benefits to all Virginians include the improved roadway safety and operation which comes from the consistent construction, review, inspection, and acceptance of streets which meet the specified requirements. The standards ensure access to homes, schools, businesses and other facilities by emergency response vehicles, reduce accident-causing congestion, and promote the safe efficient/effective movement of people and goods.</p>
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(2) Quantitative Factors	Estimated Dollar Amount	Present Value	
Direct Costs	(a)	(c)	
Direct Benefits	(b)	(d)	
(3) Benefits-Costs Ratio		(4) Net Benefit	
(5) Indirect Costs & Benefits	Indirect costs and benefits accrue to VDOT. The indirect costs include maintaining the streets that are accepted into the secondary system of state highways as a result of the street plan reviews. Indirect benefits include the assurance that state resources are being used efficiently, since without this regulation, developers could construct poor quality roads which the state would be responsible to improve.		
(6) Information Sources			
(7) Optional			

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

This table addresses current requirements and the implications of not making any changes. In other words, describe the costs and benefits of maintaining the current regulatory requirements as is.

(1) Direct Costs & Benefits	<ul style="list-style-type: none"> See table 1a. 		
(2) Quantitative Factors	Estimated Dollar Amount	Present Value	
Direct Costs	(a)	(c)	
Direct Benefits	(b)	(d)	
(3) Benefits-Costs Ratio		(4) Net Benefit	
(5) Indirect Costs & Benefits			

(6) Information Sources	
(7) Optional	

Table 1c: Costs and Benefits under an Alternative Approach

This table addresses an alternative approach to accomplishing the objectives with different requirements. These alternative approaches may include the use of reasonably available alternatives in lieu of regulation, or information disclosure requirements or performance standards instead of regulatory mandates.

(1) Direct Costs & Benefits	<ul style="list-style-type: none"> • Describe first alternative proposed impactful change here. <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <ul style="list-style-type: none"> • Use additional bullets as needed 		
(2) Quantitative Factors	Estimated Dollar Amount	Present Value	
Direct Costs	(a)	(c)	
Direct Benefits	(b)	(d)	
(3) Benefits-Costs Ratio		(4) Net Benefit	
(5) Indirect Costs & Benefits			
(6) Information Sources			
(7) Optional			

Impact on Local Partners

- (1) Describe the direct costs and benefits (as defined on page 1) for local partners in terms of real monetary costs and FTEs. Local partners include local or tribal governments, school divisions, or other local or regional authorities, boards, or commissions. If local partners are not affected, include a specific statement to that effect and a brief explanation of the rationale.
- (2) Quantitative Factors:
 - (a) Enter estimated dollar value of total (overall) direct costs described above.
 - (b) Enter estimated dollar value of total (overall) direct benefits described above.
- (3) Indirect Costs & Benefits: Describe any indirect benefits and costs (as defined on page 1) for local partners that are associated with all significant changes. If there are no indirect costs or benefits, include a specific statement to that effect.
- (4) Information Sources: describe the sources of information used to determine the benefits and costs, including the source of the Quantitative Factors. If dollar amounts are not available, indicate why they are not.
- (5) Assistance: Identify the amount and source of assistance provided for compliance in both funding and training or other technical implementation assistance.
- (6) Optional: Use this space to add any further information regarding the data provided in this table, including calculations, qualitative assessments, etc.

Note: If any of the above information was included in Table 1, use the same information here.

Table 2: Impact on Local Partners

(1) Direct Costs & Benefits	No direct costs to local partners have been identified. Direct benefits to local partners include the improved roadway safety and operation which comes from the consistent construction, review, inspection, and acceptance of streets which meet the specified requirements. The standards ensure access to homes, schools, businesses and other facilities by emergency response vehicles, reduce accident-causing congestion, and promote the safe and efficient/effective movement of people and goods.
(2) Quantitative Factors	Estimated Dollar Amount
Direct Costs	(a)
Direct Benefits	(b)
(3) Indirect Costs & Benefits	No indirect costs to local partners have been identified. Indirect benefits may accrue to local partners. Some Virginia counties do not allow land to be subdivided unless the roads which serve the new parcels meet the regulatory requirements, thereby resulting in better transportations systems for those areas.

(4) Information Sources	
(5) Assistance	
(6) Optional	

Economic Impacts on Families

- (1) Describe the direct costs and benefits (as defined on page 1) to a typical family of three (average family size in Virginia according to the U. S. Census) arising from any proposed regulatory changes that would affect the costs of food, energy, housing, transportation, healthcare, and education. If families are not affected, include a specific statement to that effect and a brief explanation of the rationale.
- (2) Quantitative Factors:
 - (a) Enter estimated dollar value of direct costs.
 - (b) Enter estimated dollar value of direct benefits.
- (3) Indirect Costs & Benefits: Describe any indirect costs and benefits (as defined on page 1) to a typical family of three that are most likely to result from the proposed changes.
- (4) Information Sources: describe the sources of information used to determine the benefits and costs, including the source of the Quantitative Factors. If dollar amounts are not available, indicate why not.
- (5) Optional: Use this space to add any further information regarding the data provided in this table, including calculations, qualitative assessments, etc.

Note: If any of the above information was included in Table 1, use the same information here.

Table 3: Impact on Families

(1) Direct Costs & Benefits	No direct costs to families have been identified. Direct benefits to families include the improved roadway safety and operation which comes from the consistent construction, review, inspection, and acceptance of streets which meet the specified requirements. The standards ensure access to homes, businesses and other facilities by emergency response vehicles, reduce accident-causing congestion, and promote the safe and efficient/effective movement of people and goods. Furthermore, some lending companies will not approve home mortgages unless the dwellings are located on publicly maintained roads which meet the regulatory requirements, thereby ensuring the families purchasing those dwellings receive proper access from emergency response vehicles and that the roadways servicing their dwellings are safely and adequately maintained.
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(2) Quantitative Factors	Estimated Dollar Amount
Direct Costs	(a)
Direct Benefits	(b)
(3) Indirect Costs & Benefits	Indirect costs to families could include the potential for higher costs of housing in those subdivisions subject to the SSR, due to the higher costs of road development which may be passed on to homebuyers by developers. No indirect benefits to families have been identified.
(4) Information Sources	
(5) Optional	

Impacts on Small Businesses

- (1) Describe the direct costs and benefits (as defined on page 1) for small businesses. For purposes of this analysis, “small business” means the same as that term is defined in § 2.2-4007.1. If small businesses are not affected, include a specific statement to that effect and a brief explanation of the rationale.
- (2) Quantitative Factors:
 - (a) Enter estimated dollar value of direct costs.
 - (b) Enter estimated dollar value of direct benefits.
- (3) Indirect Costs & Benefits: Describe the indirect benefits and costs (as defined on page 1) for small businesses that are most likely to result from the proposed changes.
- (4) Alternatives: Add a qualitative discussion of any equally effective alternatives that would make the regulatory burden on small business more equitable compared to other affected business sectors, and how those alternatives were identified.
- (5) Information Sources: describe the sources of information used to determine the benefits and costs, including the source of the Quantitative Factors. If dollar amounts are not available, indicate why not.
- (6) Optional: Use this space to add any further information regarding the data provided in this table, including calculations, qualitative assessments, etc.

Note: If any of the above information was included in Table 1, use the same information here.

Table 4: Impact on Small Businesses

(1) Direct Costs & Benefits	If developers qualify as small businesses, then these small businesses would bear the direct costs of preparing and paying the required surety and fees to submit their street plans to VDOT. They would also bear the direct cost of constructing their streets to the SSR standards, which may cost more than if they were not constructed to these standards. Direct benefits to small businesses include the improved roadway safety and operation which comes from the consistent construction, review, inspection, and acceptance of streets which meet the specified requirements. The standards ensure access to homes, businesses and other facilities by emergency response vehicles, reduce accident-causing congestion, and promote the safe and effective/efficient movement of people and goods.
(2) Quantitative Factors	Estimated Dollar Amount
Direct Costs	(a)
Direct Benefits	(b)
(3) Indirect Costs & Benefits	No indirect costs and benefits to small businesses have been identified.
(4) Alternatives	
(5) Information Sources	
(6) Optional	

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.

Table 5: Total Number of Requirements

	Number of Requirements			
Chapter number	Initial Count	Additions	Subtractions	Net Change
24 VAC 30-91	32,141	0	0	0