

Office of Regulatory Management
Economic Review Form

Agency name	Board of Wildlife Resources
Virginia Administrative Code (VAC) Chapter citation(s)	4 VAC 15-20
VAC Chapter title(s)	Definitions and Miscellaneous: In General
Action title	Access permit requirements; threatened & endangered species list
Date this document prepared	June 7, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Exempt 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>Direct Costs: 4VAC15-20-66: This proposal is not anticipated to have any associated direct costs. 4VAC15-20-130: This proposal is not anticipated to have any associated direct costs.</p> <p>Indirect Costs: 4VAC15-20-66: This proposal is not anticipated to have any associated indirect costs. 4VAC15-20-130: This proposal is not anticipated to have any associated indirect costs.</p> <p>Direct Benefits: 4VAC15-20-66: This proposal is not anticipated to have any associated direct benefits. 4VAC15-20-130: This proposal is not anticipated to have any associated direct benefits.</p> <p>Indirect Benefits: 4VAC15-20-66: This proposal is not anticipated to have any associated indirect benefits. 4VAC15-20-130: This proposal is not anticipated to have any associated indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	<p>4VAC15-20-66: this proposal will result in consistency with the Code of Virginia.</p> <p>4VAC15-20-130: this proposal removes the sickle darter and the Atlantic pigtoe from the list of state threatened species. This is being done because both species have been added to the federal list of threatened and endangered species by the United States Fish and Wildlife Service. Removing them from the state list avoids duplication. Updating the date reference for the federal Endangered Species Act avoids confusion.</p>	
(5) Information Sources	List of federal endangered species; DWR Wildlife and Aquatics Divisions information.	

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

(1) Direct & Indirect Costs &	Direct Costs: 4VAC15-20-66: The status quo is not anticipated to have any associated direct costs.
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Benefits (Monetized)	<p>4VAC15-20-130: The status quo is not anticipated to have any associated direct costs.</p> <p>Indirect Costs: 4VAC15-20-66: The status quo is not anticipated to have any associated indirect costs. 4VAC15-20-130: The status quo is not anticipated to have any associated indirect costs.</p> <p>Direct Benefits: 4VAC15-20-66: The status quo is not anticipated to have any associated direct benefits. 4VAC15-20-130: The status quo is not anticipated to have any associated direct benefits.</p> <p>Indirect Benefits: 4VAC15-20-66: The status quo is not anticipated to have any associated indirect benefits. 4VAC15-20-130: The status quo is not anticipated to have any associated indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	<p>4VAC15-20-66: the status quo is inconsistent with language found in the Code of Virginia, which leads to confusion of the public.</p> <p>4VAC15-20-130: the status quo would leave Virginia’s list of threatened and endangered species with two species on it that are now federally listed, which is duplicative.</p>	
(5) Information Sources	List of federal endangered species; DWR Wildlife and Aquatics Divisions information.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: 4VAC15-20-66: there are no alternatives to be considered; regulatory language must be consistent with the Code of Virginia. 4VAC15-20-130: as an alternative, the removal of state-listed species (sickle darter and Atlantic pigtoe) could be proposed, and the current effective date of the federal threatened and endangered species list (April 30, 2021) could be maintained. However, no matter any action taken by Virginia, the federal listing remains effective, and therefore any alternative course would have no substantive effect but could lead to duplication or confusion.</p> <p>Indirect Costs: 4VAC15-20-66: N/A</p>
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	4VAC15-20-130: N/A Direct Benefits: 4VAC15-20-66: N/A 4VAC15-20-130: N/A Indirect Benefits: 4VAC15-20-66: N/A 4VAC15-20-130: 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	List of federal endangered species; DWR Wildlife and Aquatics Divisions information.	

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)	Direct Costs: No section included in this proposal is anticipated to have any impact on local partners. Indirect Costs: No section included in this proposal is anticipated to have any impact on local partners. Direct Benefits: No section included in this proposal is anticipated to have any impact on local partners. Indirect Benefits: No section included in this proposal is anticipated to have any impact on local partners.	
(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: This proposal is not anticipated to have any associated direct costs for small businesses.</p> <p>Indirect Costs: This proposal is not anticipated to have any associated indirect costs for small businesses.</p> <p>Direct Benefits: This proposal is not anticipated to have any associated direct benefit for small businesses.</p> <p>Indirect Benefits: This proposal is not anticipated to have any associated indirect benefits for small businesses.</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) Alternatives	N/A	
(5) Information Sources	N/A	

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
4VAC15-20-66	1	0	0	0
4VAC15-20-130	1	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
N/A	N/A	N/A	N/A	N/A

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
4VAC15-20-130	Removal of two species from state endangered species list.	These species are currently addressed by the federal ESA and therefore their take is prohibited; however, removal from the state list avoids duplication between the state and federal lists and sole state enforcement mechanisms.

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			