

Office of Regulatory Management

Economic Review Form

<b>Agency name</b>	Board of Wildlife Resources
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	4VAC15-40; 4VAC15-50; 4VAC15-70; 4VAC15-90, 4VAC15-240
<b>VAC Chapter title(s)</b>	Game: In General; Game: Bear; Game: Bobcat; Game: Deer; Game: Turkey
<b>Action title</b>	Harvest reporting requirements for certain game species
<b>Date this document prepared</b>	June 14, 2023
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	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)	<ul style="list-style-type: none"> <li>• <b>Combining multiple (8) regulation sections for reporting the harvest of various game species into a single harvest reporting regulation section and including gray fox on the list of game species for which harvest reporting is required.</b></li> </ul> <p>Direct Costs: There are no anticipated direct costs for this proposal.</p> <p>Indirect Costs: Staff time will be needed to integrate gray fox into the harvest reporting system. However, the amount of time necessary to integrate gray fox will be minimal as reporting requirements for this species will mirror the requirements for bobcats which are already in the system.</p> <p>Direct Benefits: There are no anticipated direct benefits from this proposal.</p> <p>Indirect Benefits: By combining all existing harvest reporting regulation sections into a single, new regulation section, staff time invested in future regulatory amendments will be minimized and the potential for editing errors/oversights is greatly reduced as only one regulation section needs to be amended.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) None
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	Enforcement of harvest reporting violations will be simplified and streamlined for the department’s Conservation Police Officers as they will only need to recall and reference a single regulation section pertaining to harvest reporting.	
(5) Information Sources	Department law enforcement management practices	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<ul style="list-style-type: none"> <li>• <b>Combining multiple (8) regulation sections for reporting the harvest of various game species into a single harvest reporting regulation and including gray fox on the list of game species for which harvest reporting is required.</b></li> </ul>	
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	<p>Direct Costs: There is no anticipated direct cost associated with maintaining the status quo.</p> <p>Indirect Costs: Failure to combine the multiple regulation sections pertaining to harvest reporting into a single regulation section could lead to increased staff time in making future regulation amendments. Changes to the harvest reporting requirements typically involve amending multiple, redundant regulation sections across game species for which reporting is required..</p> <p>Direct Benefits: There is no anticipated direct benefit from maintaining the status quo.</p> <p>Indirect Benefits: There is no anticipated indirect benefit from maintaining the status quo.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) None
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p><b>Alternative: Eliminate the requirement for reporting the harvest of certain game species.</b></p> <p>Direct Costs: There are no direct costs anticipated with this alternative approach.</p> <p>Indirect Costs: Hunter provided harvest data is widely recognized within the wildlife management field as the lowest cost option for gathering a high volume of data to monitor game species population levels and trends over time. Elimination of hunter provided harvest data would necessitate development of alternative data collection efforts, requiring staff time and financial resources to be invested into researching and implementing alternative approaches.</p>
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	<p>Direct Benefits: There are no anticipated direct benefits associated with this alternative.</p> <p>Indirect Benefits: There are no anticipated indirect benefits associated with this alternative.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) None
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources	N/A	

**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)	<p>Direct Costs: There is no anticipated direct cost to local partners.</p> <p>Indirect Costs: There is no anticipated indirect cost to local partners.</p> <p>Direct Benefits: There is no anticipated direct benefit to local partners.</p> <p>Indirect Benefits: There is no anticipated indirect benefit to local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None

(3) Other Costs & Benefits (Non-Monetized)	None
(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)	Direct Costs: There is no anticipated direct cost to families. Indirect Costs: There is no anticipated indirect cost to families. Direct Benefits: There is no anticipated direct benefit to families. Indirect Benefits: There is no anticipated indirect benefit to families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	None	
(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)	Direct Costs: There is no anticipated direct cost to small businesses. Indirect Costs: There is no anticipated indirect cost to small businesses.
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Benefits (Monetized)	<p>Direct Benefits: There is no anticipated direct benefit to small businesses.</p> <p>Indirect Benefits: There is no anticipated indirect benefit to small businesses.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	None	
(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*

<b>VAC Section(s) Involved</b>	<b>Initial Count</b>	<b>Additions</b>	<b>Subtractions</b>	<b>Net Change</b>
4VAC15-40-290 (new) 4VAC15-40-300 (repeal) 4VAC15-50-81 (repeal) 4VAC15-50-91 (repeal) 4VAC15-70-70 (repeal) 4VAC15-90-231 (repeal) 4VAC15-90-241 (repeal) 4VAC15-90-500 4VAC15-90-510 4VAC15-240-81 (repeal) 4VAC15-240-91 (repeal)	69	25	47	-22

*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>
4VAC15-40-290 (new) 4VAC15-40-300 (repeal) 4VAC15-50-81 (repeal) 4VAC15-50-91 (repeal) 4VAC15-70-70 (repeal) 4VAC15-90-231 (repeal)	Combining multiple (8) regulations sections for reporting the harvest of various game species into a single harvest reporting regulation and including gray	Indeterminate	Indeterminate	Indeterminate

4VAC15-90-241 (repeal) 4VAC15-90-500 4VAC15-90-510 4VAC15-240-81 (repeal) 4VAC15-240-91 (repeal)	fox on the list of game species for which harvest reporting is required.			
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*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>
4VAC15-40-290 (new) 4VAC15-40-300 (repeal) 4VAC15-50-81 (repeal) 4VAC15-50-91 (repeal) 4VAC15-70-70 (repeal) 4VAC15-90-231 (repeal) 4VAC15-90-241 (repeal) 4VAC15-90-500 4VAC15-90-510 4VAC15-240-81 (repeal) 4VAC15-240-91 (repeal)	Combining multiple (8) regulation sections for reporting the harvest of various game species into a single harvest reporting regulation and including gray fox on the list of game species for which harvest reporting is required.	Existing harvest reporting regulations contain a baseline of 69 regulatory requirements across 8 regulation sections. Streamlining these 8 regulation sections into a single regulation section, while adding a requirement to report the harvest of gray foxes, eliminates 47 regulatory requirements from that baseline, resulting in a new baseline of 25 regulatory requirements (31.9% reduction in regulatory requirements).

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

<b>Title of Guidance Document</b>	<b>Original Length</b>	<b>New Length</b>	<b>Net Change in Length</b>
N/A			