

## AGENCY RESPONSE TO THE ORM ECONOMIC IMPACT ANALYSIS

The agency concurs with the analysis of the Department of Planning and Budget concerning the Proposed amendments to 12 VAC 5-440, Regulations for Summer Camps with the following exceptions:

### **Estimated Benefits and Costs**

DPB states, "VDH anticipates that the proposed inspection requirements (in proposed section 180) may cost the agency up to an additional \$8,769 per year in extra staff time (or \$74.31 per inspection) due to the addition of a pre-opening inspection; the current practice is to only conduct an inspection at least once per permit period during normal operating hours." The agency emphasized in the ORM ERF and continues to express that this amount conservatively assumes all facilities will require a pre-opening and a routine inspection. This will not be the case as many, if not most, facilities will not require a pre-opening inspection.

### **Effects on the Use and Value of Private Property**

DPB states, "The proposed amendments could affect real estate development costs specifically for the development of new resident camps or additions to existing resident camps to the extent that the requirements for the construction of resident camp structures and provision of sanitary facilities, water supply, and sewage disposal differ from any requirements that are currently implemented in practice, even if those requirements are not in the current regulation." In response, the agency would like to clarify that sewage disposal requirements outlined in the proposed regulations refer to the existing requirements of the Sewage Handling and Disposal Regulations (12VAC5-610) and do not prescribe any additional or different requirements related to on-site sewage disposal. Further, the subsections of the proposed regulations that outline individual sewer connections for a camping vehicle reiterate the existing requirements outlined in the Rules and Regulations Governing Campgrounds (12VAC-450-90.H) and are considered the regulatory standard for proper sewage handling and connection of a camping vehicle to a sewage disposal system.