Office of Regulatory Management

Economic Review Form

Agency name	Board of Wildlife Resources
Virginia Administrative Code (VAC) Chapter citation(s)	4VAC15-40; 4VAC15-50; 4VAC15-70; 4VAC15-90, 4VAC15-240
VAC Chapter title(s)	Game: In General; Game: Bear; Game: Bobcat; Game: Deer; Game: Turkey
Action title	Harvest reporting requirements for certain game species
Date this document prepared	April 14, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Exempt Proposed

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)	 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. Direct Costs: There are no anticipated direct costs for this proposal. 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. Direct Benefits: There are no anticipated direct benefits from this 		
	proposal.		
	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.		
(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)

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(1) Direct &	• Combining multiple (8) regulation sections for reporting the
Indirect Costs &	harvest of various game species into a single harvest
Benefits	reporting regulation and including gray fox on the list of
(Monetized)	game species for which harvest reporting is required.

Direct Costs: There is no anticipated direct cost associated with maintaining the status quo. 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.. Direct Benefits: There is no anticipated direct benefit from maintaining the status quo. Indirect Benefits: There is no anticipated indirect benefit from maintaining the status quo. (2) Present Monetized Values Direct & Indirect Costs Direct & Indirect Benefits (a) Indeterminate (b) None (3) Net Monetized Indeterminate Benefit (4) Other Costs & None Benefits (Non-Monetized) (5) Information N/A Sources

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

(1) Direct &	Alternative: Eliminate the requirement for reporting the harvest of
Indirect Costs &	certain game species.
Benefits	
(Monetized)	Direct Costs: There are no direct costs anticipated with this alternative approach.
	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.

	Direct Benefits: There are no anticipated direct benefits associated with this alternative. Indirect Benefits: There are no anticipated indirect benefits associated with this alternative.		
(2) Present Monetized Values	Direct & Indirect Costs (a) Indeterminate	Direct & Indirect Benefits (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 &	Direct Costs: There is no anticipated direct cost to local partners.				
Benefits (Monetized)	Indirect Costs: There is no anticipated indirect cost to local partners.				
(Wonetized)	Direct Benefits: There is no anticipated direct benefit to local partners.				
	Indirect Benefits: There is no anticipated indirect benefit to local partners.				
(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 Benefit		
	(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 &	Direct Costs: There is no anticipated direct cost to small businesses.
Indirect Costs &	
	Indirect Costs: There is no anticipated indirect cost to small businesses.

Benefits (Monetized)	Direct Benefits: There is no anticipated direct benefit to small businesses. Indirect Benefits: There is no anticipated indirect benefit to small businesses.			
(2) Present Monetized Values	Direct & Indirect Costs (a) None Direct & Indirect Benefits (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

VAC Section(s)	Initial Count	Additions	Subtractions	Net Change
Involved				
4VAC15-40-290	59	24	45	-21
(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)				

Cost Reductions or Increases (if applicable)

VAC Section(s)	Description of	Initial Cost	New Cost	Overall Cost
Involved	Regulatory			Savings/Increases
	Requirement			
4VAC15-40-290	Combining	Indeterminate	Indeterminate	Indeterminate
(new)	multiple (8)			
4VAC15-40-300	regulations			
(repeal)	sections for			
4VAC15-50-81	reporting the			
(repeal)	harvest of			
4VAC15-50-91	various game			
(repeal)	species into a			
4VAC15-70-70	single harvest			
(repeal)	reporting			
4VAC15-90-231	regulation and			
(repeal)	including gray			

4VAC15-90-241	fox on the list of		
(repeal)	game species for		
4VAC15-90-500	which harvest		
4VAC15-90-510	reporting is		
4VAC15-240-81	required.		
(repeal)			
4VAC15-240-91			
(repeal)			

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved	Description of Regulatory	Overview of How It Reduces
	Change	or Increases Regulatory
		Burden
4VAC15-40-290 (new)	Combining multiple (8)	The department's existing
4VAC15-40-300	regulation sections for	regulation sections requiring
(repeal)	reporting the harvest of various	hunters to report the harvest of
4VAC15-50-81	game species into a single	certain game species are highly
(repeal)	harvest reporting regulation and	redundant and changes to
4VAC15-50-91	including gray fox on the list of	regulatory requirements for
(repeal)	game species for which harvest	harvest reporting routinely
4VAC15-70-70	reporting is required.	involve multiple regulation
(repeal)		sections and redundancy in
4VAC15-90-231		staff effort to effect changes.
(repeal)		A single regulation would
4VAC15-90-241		eliminate redundancy and
(repeal)		streamline future regulatory
4VAC15-90-500		changes and simplify
4VAC15-90-510		enforcement of harvest
4VAC15-240-81		reporting regulations. Gray fox
(repeal)		is proposed to be added to the
4VAC15-240-91		list of game species required to
(repeal)		be reported by hunters. This
		addition is in response to long-
		term, significant declines in the
		gray fox population and need
		for addition population-level
		data for this species.

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

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