

Office of Regulatory Management
Economic Review Form

Agency name	Board of Wildlife Resources
Virginia Administrative Code (VAC) Chapter citation(s)	4 VAC 15-110
VAC Chapter title(s)	Game: Fox
Action title	Gray Fox hunting
Date this document prepared	April 17, 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)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: 4VAC15-110-20: This proposal is not anticipated to have any associated direct costs. 4VAC15-110-25: This proposal is not anticipated to have any associated direct costs. 4VAC15-110-35: This proposal is not anticipated to have any associated direct costs. 4VAC15-110-80: This proposal is not anticipated to have any associated direct costs; the proposal simply corrects regulatory language to be consistent with the Code of Virginia (§29.1-517).</p> <p>Indirect Costs: 4VAC15-110-20: This proposal is not anticipated to have any associated indirect costs. 4VAC15-110-25: This proposal may have indirect costs in the form of reduced hunter expenditures due to a shortened season for gray fox hunting with firearms. Based on the Department’s annual Hunter Survey, however, very few hunters specifically target gray fox for harvest with firearms. Therefore, it is believed that reductions in expenditures will be minimal. 4VAC15-110-35: This proposal is not anticipated to have any associated indirect costs. 4VAC15-110-80: This proposal is not anticipated to have any associated indirect costs.</p> <p>Direct Benefits: 4VAC15-110-20: This proposal is not anticipated to have any associated direct benefits. 4VAC15-110-25: This proposal is not anticipated to have any associated direct benefit. 4VAC15-110-35: This proposal is not anticipated to have any associated direct benefit. 4VAC15-110-80: This proposal is not anticipated to have any associated direct benefit.</p> <p>Indirect Benefits: 4VAC15-110-20: This proposal is not anticipated to have any associated indirect benefits. 4VAC15-110-25: This proposal will have indirect benefits in an indeterminate amount associated with preservation of Virginia’s gray fox population and associated benefits from hunting, trapping, and other wildlife-based recreation. 4VAC15-110-35: This proposal will have indirect benefits in an indeterminate amount associated with preservation of Virginia’s gray fox population and associated benefits from hunting, trapping, and other wildlife-based recreation. 4VAC15-110-80: This proposal is not anticipated to have any associated indirect benefits, though it may help reduce any confusion that could</p>
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	result from differing language in the Code of Virginia and the Virginia Administrative Code.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) Indeterminate
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	The proposals, in concert, are intended to help preserve Virginia’s gray fox population, while observing landowner authorization to address depredation concerns as found in the Code of Virginia. Preservation of wildlife populations benefits economic interests associated with hunting, trapping, and other wildlife-based recreation, as well as saving response costs that would be incurred by the Department and others to population concerns.	
(5) Information Sources	Department of Wildlife Resources Hunter Survey; Gray Fox population data.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: 4VAC15-110-20: The status quo is not anticipated to have any associated direct costs. 4VAC15-110-25: The status quo is not anticipated to have any associated direct costs. 4VAC15-110-35: The status quo is not anticipated to have any associated direct costs. 4VAC15-110-80: The status quo is not anticipated to have any associated direct costs.</p> <p>Indirect Costs: 4VAC15-110-20: The status quo is not anticipated to have any associated indirect costs. 4VAC15-110-25: Indirect costs associated with the status quo include response costs incurred by the Department and others to a declining gray fox population. Hunting opportunity would also be reduced in the event that the gray fox population declined to a point where greater protections could be necessary, which would come with an associated loss in hunter expenditures. 4VAC15-110-35: Indirect costs associated with the status quo include response costs incurred by the Department and others to a declining gray fox population. Hunting opportunity would also be reduced in the event that the gray fox population declined to a point where greater protections could be necessary, which would come with an associated loss in hunter expenditures.</p>
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	<p>4VAC15-110-80: The status quo is not anticipated to have any associated indirect costs.</p> <p>Direct Benefits: 4VAC15-110-20: The status quo is not anticipated to have any associated direct benefits. 4VAC15-110-25: The status quo is not anticipated to have any associated direct benefits. 4VAC15-110-35: The status quo is not anticipated to have any associated direct benefits. 4VAC15-110-80: The status quo is not anticipated to have any associated direct benefits.</p> <p>Indirect Benefits: 4VAC15-110-20: Maintaining the current open season for harvest of gray fox with firearms would provide greater hunter opportunity, at least in the short term while populations could sustain associated harvest. Based on the Department’s annual Hunter Survey, however, it is believed that relatively few hunters pursue gray fox with firearms as a primary target species. 4VAC15-110-25: Maintaining the current open season for harvest of gray fox with firearms would provide greater hunter opportunity, at least in the short term while populations could sustain associated harvest. Based on the Department’s annual Hunter Survey, however, it is believed that relatively few hunters pursue gray fox with firearms as a primary target species. 4VAC15-110-35: Maintaining the current open season for harvest of gray fox with firearms would provide greater hunter opportunity, at least in the short term while populations could sustain associated harvest. Based on the Department’s annual Hunter Survey, however, it is believed that relatively few hunters pursue gray fox with firearms as a primary target species. 4VAC15-110-80: The status quo is not anticipated to have any associated indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate	(b) Indeterminate
(3) Net Monetized Benefit	Indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	The status quo would further threaten gray fox populations, which are currently in decline. Preservation of wildlife populations benefits economic interests associated with hunting, trapping, and other wildlife-based recreation, as well as saving response costs that would be incurred by the Department and others to population concerns.	

(5) Information Sources	Department of Wildlife Resources Hunter Survey; Gray Fox population data.
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Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no alternatives to be reasonably considered other than the proposal or the status quo (differing gray fox firearms hunting season lengths could be selected, but costs and benefits associated with various lengths are not able to be reduced to economic analysis based on current data. Presumably, longer seasons would come with more hunter opportunity and associated benefits, but also with costs associated with decline in gray fox populations as discussed briefly above).</p> <p>Indirect Costs: N/A</p> <p>Direct Benefits: N/A</p> <p>Indirect Benefits: N/A</p>	
(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	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: No section included in this proposal is anticipated to have any impact on local partners.</p> <p>Indirect Costs: No section included in this proposal is anticipated to have any impact on local partners.</p>
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	<p>Direct Benefits: No section included in this proposal is anticipated to have any impact on local partners.</p> <p>Indirect Benefits: No section included in this proposal is anticipated to have any impact on local partners.</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) 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
4VAC15-110-20	0 (authorizing regulation)	0	0	0
4VAC15-110-25	0 (authorizing regulation)	0	0	0
4VAC15-110-35	0	1	0	1
4VAC15-110-80	0 (authorizing regulation)	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
4VAC15-110-20	No requirement; regulation authorizes hunting season	N/A	N/A	N/A
4VAC15-110-25	No requirement; regulation authorizes hunting season	N/A	N/A	N/A
4VAC15-110-35	Bag limit for gray fox	Indeterminate	Indeterminate	Indeterminate
4VAC15-110-80	Landowner authorization to hunt gray fox	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
4VAC15-110-20	Separation of red fox and gray fox open seasons for hunting with firearms	This proposal has no impact upon hunting of red fox with firearms. Subsequent sections explained below establish a new season and associated

		rules for hunting gray fox with firearms.
4VAC15-110-25	Establishment of gray fox firearms hunting season	This proposal would provide a more limited firearms hunting opportunity for gray fox than exists today (shorter season) in order to promote a healthy gray fox population.
4VAC15-110-35	Establishment of a bag limit for gray fox harvested with firearms	This proposal would provide a more limited firearms hunting opportunity for gray fox than exists today (reduced bag limit) in order to promote a healthy gray fox population.
4VAC15-110-80	Amendment of regulatory language for consistency with the Code of Virginia	This proposal brings the Department's regulations into alignment with the Code of Virginia, which would govern in the event of any conflict in any case.

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			