


**MEMORANDUM**

**TO:** Jamie L. Green  
Commissioner  
Virginia Marine Resources Commission

**FROM:** Kelci A. Block   
Assistant Attorney General

**DATE:** November 21, 2022

**RE:** Proposed Regulation Amendments

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It is my opinion that the Virginia Marine Resources Commission has authority to promulgate the proposed amendments to 4 VAC 20-720-15 under §§ 28.2-201. It is further my opinion that the regulations are exempt from the provisions of the Virginia Administrative Process Act pursuant to §2.2-4006(A)(11) of the Code of Virginia.

The foregoing conclusion is my own. It does not constitute an opinion, formal or informal, of the Attorney General. If I may be of further assistance, please do not hesitate to contact me.