


MEMORANDUM

TO: Jamie L. Green
Commissioner
Virginia Marine Resources Commission

FROM: Kelci A. Block 
Assistant Attorney General

DATE: November 2, 2022

RE: Periodic Review

It is my opinion that the Virginia Marine Resources Commission has authority to promulgate the 4 VAC 20-1060 *et. seq.* under Va. Code §§ 28.2-103 and 106.2. 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.