



**COMMONWEALTH of VIRGINIA**  
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December 6, 2021

The Honorable Clyde Cristman, Director  
Virginia Department of Conservation and Recreation  
600 East Main Street, 24<sup>th</sup> Floor  
Richmond, Virginia 23219

Re: Authority to Promulgate Amendments to the Nutrient Management and Training and  
Certification Regulations (4 VAC 50-85 *et seq.*)

Dear Director Paylor:

I have reviewed the amendments to the above-referenced regulations. It is my opinion that the Virginia Soil and Water Conservation Board has the authority to promulgate the amendments to the regulations under applicable law including Article 1 of Title 10.1 of the Code of Virginia.

If I may be of any further assistance to you relating to this matter, please do not hesitate to contact me.

Sincerely,

*David Grandis*

David C. Grandis  
Senior Assistant Attorney General