


**MEMORANDUM**

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

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

**DATE:** October 14, 2022

**RE:** Periodic Review

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It is my opinion that the Virginia Marine Resources Commission has authority to promulgate the 4 VAC 20-754 *et. seq.* under Va. Code §§ 28.2-201 and 28.1-825. It is further my opinion that the regulations are exempt from the provisions of the Virginia Administrative Process Act pursuant to §2.2-4002(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.