



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Jeff Brown
Director of State Building Codes Office
Department of Housing and Community Development

From: Justin I. Bell
Assistant Attorney General

Date: April 16, 2024

Subject: Public Participation Guidelines [13 VAC 6 - 11] – Update after periodic review to conform to statute

I have reviewed the Manufactured Housing Board's proposed update to its Public Participation Guidelines, 13-VAC 6-11. In my view, as counsel to the Board, the Board update its Public Participation Guidelines § 36-85.36 of the Code of Virginia. Furthermore, the Board may complete this action through the fast-track rulemaking process in § 2.2-4012.1 of the Administrative Process Act as the action does not appear controversial and is necessary to comply with 2012 Acts of Assembly, Chapter 795.

The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect. This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.