



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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MEMORANDUM

To: Laura Hare
Policy Analyst
Virginia Department of Agriculture and Consumer Services

Sandra J. Adams
Commissioner
Virginia Department of Agriculture and Consumer Services

From: Justin I. Bell
Assistant Attorney General

Date: December 5, 2016

Subject: Letter of Assurance for Promulgation of Regulations Regarding Vapor Pressure Requirements for Gasoline Ethanol Blends, 2 VAC 5-425.

I have reviewed the Virginia Board of Agriculture and Consumer Services' proposed Regulations Regarding Vapor Pressure Requirements for Gasoline Ethanol Blends. In my view, as counsel to the Virginia Board of Agriculture and Consumer Services, these regulations may be promulgated pursuant to §§ 59.1-153 and 59.1-156(A) of the *Code of Virginia*. 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.