



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Greg Campbell
Director

FROM: Christian Pedersen
Senior Assistant Attorney General
Transportation Section

DATE: May 16, 2022

SUBJECT: Take-Off and Landing Unmanned Aircraft on Property Owned by Political
Subdivision or Locality, 24VAC5-20

At your request, I have reviewed the Department of Aviation's proposed regulations entitled "Take-Off and Landing Unmanned Aircraft on Property Owned by Political Subdivision or Locality" (24VAC5-20). This memorandum addresses legal matters only and is not intended as a comment for or against the merits of the proposed regulations.

In my capacity as legal counsel for the Virginia Department of Aviation and the Virginia Aviation Board, it is my legal opinion that the Department and the Board have the authority under Va. Code § 15.2-926.3 to promulgate the regulations. Further, pursuant to Virginia Code § 2.2-4006(A)(4)(a), this regulatory action is exempt from the Administrative Process Act.