

# OPPOSE HB329

Topic: Administrative Process Act; regulations; public notice and economic impact; prohibitions on certain regulations

Bill Patron: Delegate Nicholas Freitas

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## Reasons to Oppose HB329:

- Dramatically changes the scope and process for state agencies to write new regulations
- Prohibits any state agency from writing a regulation that, in the aggregate, causes more than \$10 million in implementation and compliance costs unless specifically authorized by statute

## Overview:

Administrative agencies play a vital role in promulgating regulations for a wide array of government programs. The role of agencies is heightened in states like Virginia, where the legislature holds a shortened session. Forbidding the promulgation of regulations with over a \$10 million impact, absent an explicit statutory allowance, will create an inefficient system that will place regulations in limbo while the legislature is not in session. Furthermore, the \$10 million provision will effectively forbid a host of crucial environmental regulations. In addition, requiring a determination from the Attorney General and approval by the Governor before a regulation can proceed will place an unnecessary hurdle in the already complicated process for rulemaking.



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This position was taken by Virginia Conservation Network (VCN)'s Legislative Committee and Board of Directors and is supported by Virginia's conservation community. For a complete list of VCN positions, visit [www.vcnva.org/bill-tracker](http://www.vcnva.org/bill-tracker). VCN is committed to building a powerful, diverse, and highly-coordinated conservation movement focused on protecting our Commonwealth's natural resources today and for tomorrow.