



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

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August 8, 2016

Hunter Moore, Natural Resource Policy Advisor, Office of the Arizona Governor  
1700 W. Washington, Executive Tower  
Phoenix, AZ 85007-2888

Re: Moratorium Exception Request to Initiate Rulemaking to Clarify Rules Governing the  
Permitting Process for Government Agencies

Dear Mr. Moore,

The Arizona Game and Fish Department (Department) respectfully submits this letter requesting permission to initiate rulemaking to implement recommendations designed to ensure the Department maintains sovereignty over Arizona's wildlife.

Due to recent events, the Arizona Game and Fish Commission (Commission) directed the Department's Assistant Attorneys General to evaluate current game and fish laws and rules to determine whether Arizona has regulations in place to effectively govern permitting for conducting wildlife related activities by other government agencies.

As a result of this review, the Department has determined it is necessary to amend Commission rules to strengthen the Commission's position and authorities.

Under the guidance of our Assistant Attorneys General the Department requests permission to pursue rulemaking as authorized under item 2(i) which allows an agency to pursue rulemaking to address matters pertaining to the control, mitigation, or eradication of wasteful, fraudulent, or abusive activities perpetrated against an agency.

The Commission's intent in proposing the amendments is to protect native wildlife and their habitats by preserving a permitting process for any government agency seeking to conduct wildlife related activities in Arizona.

If you have any questions regarding the attached summary, please contact Celeste Cook at (623) 236-7390 or by e-mail at [ccook@azgfdgov](mailto:ccook@azgfdgov).

Sincerely,

Larry D. Voyles  
Director