



Docket Supervisor - ADWR <docketsupervisor@azwater.gov>

Comments on the Douglas AMA

1 message

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To: docketsupervisor@azwater.gov

Mon, Jun 26, 2023 at 12:30 PM

These comments are being submitted on behalf of the Friends of the Sonoran Desert, a registered public charity in the State of Arizona. We appreciate the opportunity to participate in the public process for the establishment of the Douglas AMA.

On behalf of FSD I want to express appreciation for the help we have received from the Department's personnel in reviewing efforts to establish the AMA, and to provide comments on the substantive proposed action.

Earlier i suggested that there be a small extension of the comment period and was informed that would not be granted, and that the comments would be closed as of January 28 by midnight that evening after the public meeting scheduled in Douglas. (I am travelling up and back from Tucson). I have extensive experience in such public processes having worked for much of my career in government in the Department of the Interior and the Executive Office of the President, and in the NGO sector primarily in Washington, DC.

I don't understand this timing of having comments due on the same day of an important, two hour public meeting ending in the early evening of that day. Timing that could largely preclude attendees to a two hour public meeting in the early evening from the opportunity to create comments on issues of importance that were reviewed during the meeting. The timing assumes that meeting attendees would physically have the capacity to write comments and send them electronically that same evening.

My request was denied, noting that I could provide comments up to midnight on the day of the meeting. I was encouraged to work up until midnight to submit my comments on the proposed action and email them to the Department. I question the wisdom of this deadline. Is it prescribed by law or regulation? Why not provide interested parties a few more days in such a process to review the issues raised in the meeting and provide their comments in a manner that would enable and ensure they would be considered? Is any part of this process driven by statutory or regulatory requirements that would preclude such an extension or scheduling?

When I made a request earlier today to clarify where comments should be sent, I was told that would be earp@azwater.gov, but that was later clarified by Sharon Scantlebury (who has been most helpful) to be docketsupervisor@azwater.gov.

I will be following on with additional substantive comments for the establishment of the AMA.

Most Sincerely,

Roger E. McManus
Member of the Board of Directors
Friends of the Sonoran Desert