

# MEMORANDUM



To: Natalie Mast, AMA Director  
From: Casey Allman, Madison Moreno  
Date: 11/5/2024  
Re: **Douglas Active Management Area (AMA) Administrative Review and Variance Process**

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Comments: The Douglas AMA First Management Plan (1MP) includes the Administrative Review and Variance process to adjust or defer the conservation requirements set forth in the 1MP. Consistent with A.R.S. §§ 45-574 and 45-575, a person who cannot comply with conservation requirements set in the management period can apply for an Administrative Review or Variance. Though not required by statute for subsequent AMAs, the Department has observed the benefits to applicants resulting from the inclusion of an Administrative Review and Variance process within the management plans for existing AMAs.

The Department's decision to include the options for Administrative Review and Variance pathways for groundwater right holders was based on expressed public comment during the development stage of the 1MP and the management plans established for existing AMAs. Administrative Review allows for a groundwater right holder to adjust allotments or conservation requirements due to economic circumstances. Variances extend the timeline of meeting conservation requirements or allotments to gain compliance status.