Director's Check-in ROC LTO Adaptive Management Discussion Points Wednesday, March 6, 2019 10:00-11:00 am

NMFS' Needs for Adaptive Management

- Comprehensive, robust Adaptive Management Program/Framework (AMP/F) repeatedly called for by independent review panels
- Can provide credible, durable solution to address uncertainty in elements of the project and effects
- Program/Framework should include:
 - o Defined process that includes the full AM cycle ("plan, assess, integrate, adapt")
 - o Means to incrementally reduce uncertainty
 - o Transparency, defined roles and authorities, clear collaborative decision-making
 - o Certainty of occurrence via commitments to funding, agreement, or buy-in

Five-Agency AMP

- Can be revised to extract CWF and address Reclamation's interest in discretion and autonomy
- Is established and has been reviewed
- Reflects concessions made by all parties, which would (inefficiently) need to be revisited if a new program/framework is developed
- List of project components are good candidates to insert as actions into a robust process
- Is supported by DFW, who requires an AMP because of lack of a programmatic ITP option

AM Approach Proposed in ROC LTO BA

- Lacks transparency and reasonable certainty; states that it does not rely on a specific structure
- Lacks temporal component (RTO vs. seasonal planning vs. multi-year experiment)
- Includes using new and existing groups with indication if the approach has traction with those groups
- BA Appendix C applies to the "Core Components" of the PA, but unclear what applies to other 20+ components
 - o NMFS would need to make assumptions for sideboards for other components
 - o Each component would need to execute the full AM process separately
 - Lack of certainty in application and effect limits ability to include in the jeopardy determination