

**NMFS briefing paper**  
**Director's Elevation ROC LTO**  
**Friday March 8, 2019**

**TOPIC: ADAPTIVE MANAGEMENT**

NMFS' Needs for Adaptive Management

1. Comprehensive, robust Adaptive Management Program/Framework (AMP/F) repeatedly called for by independent science review panels
2. Can provide credible, durable solution to address uncertainty in elements of the project and effects
3. Program/Framework should include:
  - Defined process that includes the full AM cycle (“plan, assess, integrate, adapt”)
  - Means to incrementally reduce uncertainty
  - Transparency, defined roles and authorities, clear collaborative decision-making that incorporates CSAMP, IEP, and five agencies into the process.
  - Certainty of occurrence via commitments to funding, agreement, and buy-in
  - Clear distinction between real-time and seasonal adjustments versus annual adjustments and multi-year studies.
4. NMFS needs DOSS to continue, given that it is a high-performing team, and provides important services to decision-makers (e.g., Winer OMR risk assessments, DCC gate matrix of triggers, etc.)

Benefits of using Five-Agency AMP:

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

NMFS concerns with AM Approach Proposed in ROC LTO BA:

1. Lacks transparency and reasonable certainty; states that it does not rely on a specific structure
2. Lacks temporal component (RTO vs. seasonal planning vs. multi-year experiment)
3. Includes using new and existing groups with indication if the approach has traction with those groups
4. BA Appendix C applies to the “Core Components” of the PA, but unclear what applies to other 20+ components
  - NMFS would need to make assumptions for sideboards for other components
  - 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
  - Likely consequence is that each adaptive management experiment would need to go through separate stand alone ESA consultation – creating time delays and process inefficiencies