

**IMPROVING ADAPTIVE MANAGEMENT IN THE
SACRAMENTO-SAN JOAQUIN DELTA**

**A Report from the
Delta Independent Science Board**

January 11, 2016

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49 **Summary**

50

51 Adaptive management is a science-based, structured approach to environmental
52 management. It aids decision-making in the face of uncertainty about outcomes by
53 emphasizing the acquisition and use of new knowledge, experience, and stakeholder
54 input in management of natural resources under changing conditions.

55

56 The Delta Reform Act of 2009 calls for adaptive management of efforts to make
57 water supplies more reliable and ecosystems healthier. It is often talked about, but as a
58 comprehensive, science-based process, adaptive management is little used in the Delta.
59 This is not a unique situation; many environmental management programs around the
60 world have encountered difficulties in managing natural resources adaptively.

61

62 The Delta Independent Science Board (Delta ISB) reviewed how adaptive
63 management is perceived and used in the Delta and how it might be applied more
64 efficiently and effectively. This report identifies impediments to adaptive management in
65 the Delta and makes recommendations for incorporating adaptive approaches to improve
66 management of the Delta and its resources.

67

68 **Impediments**

69

70 Adaptive management is commonly depicted as a cycle that proceeds from
71 planning, through doing, to evaluating outcomes and then modifying plans and actions as
72 needed. Monitoring and analysis are essential to adaptive management, but the cycle can
73 grind to a halt when findings must be interpreted and communicated to the decision-
74 makers who must decide whether modifications are needed.

75

76 Several additional factors contribute to the meager use of adaptive management in
77 the Delta:

78

- 79 • Managers and decision-makers may be averse to taking the risks inherent in
80 adaptive management, especially if the underlying science is inconclusive.
- 81 • Adaptive management can be ponderously slow, failing to keep up with rapid
82 changes and the urgency of management decisions.
- 83 • Multiple regulations and permit requirements may restrict management
84 flexibility.
- 85 • Adaptive management and monitoring require sufficient and dependable funding.
- 86 • Monitoring and associated costs may be greater than the perceived benefits of
87 adaptive management, making it difficult to maintain long-term interest.

- 88 • The benefits of adaptive management are often not immediately apparent, so
 89 there may be few incentives for supporting the approach.
 90

91 **Recommendations**

92
 93 To overcome these challenges, structured adaptive management will need to
 94 become second nature in managing the Delta's water, habitats, and wildlife. This will
 95 entail a unified understanding of what adaptive management is and what it is not; what it
 96 requires in resources; what it needs in organizational, operational, and regulatory
 97 flexibility; and when it is appropriate to use and when it is not. To become fully
 98 integrated into Delta management, adaptive management will require *collaboration*
 99 among agencies, managers, scientists, engineers, and stakeholders, and *commitments* by
 100 those who control resources and make decisions.
 101

102 The following recommendations aim to move adaptive management from a topic
 103 of conversation to a common and useful aspect of management programs and actions for
 104 the Delta.
 105

- 106 **1. Convene a workshop or review panel to determine how to coordinate and**
 107 **assist adaptive management in the Delta.** The Delta Stewardship Council
 108 should assemble an appropriate mix of experts, agency leaders, resource
 109 managers, practitioners, scientists, stakeholders, and regulators to consider the
 110 composition and roles of a coordinating team that will advance adaptive
 111 management in the Delta and implement the recommendations of this report.
 112
- 113 **2. Support adaptive management with funding that is dependable and flexible.**
 114 Adaptive management in the Delta will not become a reality unless the paucity
 115 and unpredictability of funding for the process are remedied. Radically different
 116 and more effective ways to fund adaptive management are needed.
 117
- 118 **3. Design and support monitoring.** Design monitoring protocols to fit the needs of
 119 management. Set the timing of measurements to correspond with the dynamics of
 120 important ecosystem processes. Monitoring should be conducted in coordination
 121 with a data-management system to make the information readily accessible for
 122 analysis and sharing.
 123
- 124 **4. Integrate science and regulations to enhance flexibility.** Rigid regulations and
 125 permitting requirements inhibit the flexibility required to change directions
 126 quickly when it becomes apparent that management outcomes are not as planned.

127 Regulatory and permitting agencies should develop innovative ways to
128 incorporate flexibility into regulations and permits..

129

130 **5. Develop a framework for setting decision points or thresholds that will**
131 **trigger a management response.** The most vexing issue in adaptive management
132 is determining when conditions should trigger a formal re-evaluation or change in
133 practices. To counter reluctance to change which may delay adaptive responses
134 (especially if the system is changing slowly), such decision points should be
135 included in adaptive-management plans at the outset.

136

137 **6. Use restoration sites to test adaptive-management and monitoring protocols.**
138 Adaptive management should be part of habitat-restoration projects envisioned in
139 California EcoRestore, so that these projects can act as learning laboratories for
140 improving adaptive management.

141

142 **7. Capitalize on unplanned experiments.** Unexpected events (e.g., extreme
143 droughts, large floods, levee breaks) or necessarily quick management decisions
144 (e.g., construction of salinity barriers, cold-water releases from dams) provide
145 opportunities to learn and test adaptive management. Capitalizing on these
146 opportunities requires having contingency plans, monitoring protocols, and
147 modeling capability in place and identifying funds and staff that can be shifted to
148 respond.

149

150 **8. Recognize when and where adaptive management is not appropriate.**
151 Adaptive management is not a panacea to be used in all situations. Sometimes,
152 adaptive management may be inappropriate or need to be greatly streamlined. In
153 other situations, sufficient support from federal, state, and local agencies may be
154 lacking. In these circumstances, attempts to implement adaptive management may
155 not be effective, and substantial changes in expectations and a refocusing of
156 adaptive management attention and even legislation may be needed. Decisions
157 about whether or how to use adaptive management should be made thoughtfully,
158 after careful consideration of the alternatives.

159

160 We believe that with greater legal and regulatory flexibility, along with firmer
161 expectations and support, adaptive management can improve the performance, reduce
162 long-term costs, and increase scientific confidence in Delta management activities. But
163 the Delta is changing, ever more rapidly. Climate change, sea-level rise, increased
164 frequency and severity of extreme events, new invasive species, economic globalization,
165 social and demographic shifts, and politics will create fundamental changes in the Delta
166 and increase uncertainty. Stewardship of the Delta and its way of life will require new

167 approaches—helping species move to new locations, accepting some non-native species
168 as part of the new nature, restoring landscapes rather than bits of habitat, balancing the
169 needs of people and the environment, and coming to grips with the inevitability that some
170 species will be lost.

171

172 The Delta can become a model of enlightened management. Adaptive
173 management is an important part, but fresh thinking and new approaches will be needed,
174 founded on a new state of mind about people, resources, and the environment. Business
175 as usual will only continue the current trend toward environmental degradation.

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176
 177 *“There will always be uncertainties that surround any action. Difficult*
 178 *political choices will be necessary. Adaptive management is the preferred*
 179 *approach to implementing management actions in the face of uncertainty.*
 180 *Regular monitoring and evaluation of the Delta’s response to*
 181 *management is the best way to detect unexpected outcomes and adjust*
 182 *management actions to deal with uncertainties.”*

183 --- Luoma et al. (2015: 17)
 184

185 **I. Background and Structure of This Report**

186
 187 The Sacramento-San Joaquin Delta is one of the most studied estuaries in the
 188 world. It is also highly variable and changing, which creates considerable uncertainty
 189 about the outcomes of current and proposed management practices. Consequently,
 190 management of the Delta must be flexible and adaptive. Science is central to this effort.
 191

192 The Sacramento-San Joaquin Delta Reform Act of 2009 (SBX7 1) directed the
 193 Delta Stewardship Council to develop a Delta Plan to serve as the blueprint for achieving
 194 the coequal goals of (1) providing a more reliable water supply for California and (2)
 195 protecting, restoring, and enhancing the Delta ecosystem. The Act stipulated that the Plan
 196 “include a science-based, transparent, and formal adaptive management strategy for
 197 ongoing ecosystem restoration and water management decisions” (Water Code section
 198 85308(f)). The Delta Plan further stated that “Ecosystem restoration and water
 199 management covered actions¹ must include adequate provisions, appropriate to the scope
 200 of the covered action, to assure continued implementation of adaptive management ...”
 201 (Delta Plan G P1; 23 CCR section 5002(b)(4)). In other words, an adaptive management
 202 strategy is *required* for most significant ecosystem restoration and water-management
 203 projects in the Delta. Additionally, in establishing the Delta Independent Science Board
 204 (hereafter, Delta ISB or “we”), the Act further required that the Delta ISB “provide
 205 oversight of the scientific research, monitoring, and assessment programs that support
 206 adaptive management of the Delta through periodic reviews...” (Water Code section
 207 85280(a)(3)).
 208

¹ Covered action means a plan, program, or project as defined pursuant to Section 21065 of the Public Resources Code that meets all of the following conditions: (1) Will occur, in whole or in part, within the boundaries of the Delta or Suisun Marsh; (2) Will be carried out, approved, or funded by the state or a local public agency; (3) Is covered by one or more provisions of the Delta Plan; and (4) Will have a significant impact on achievement of one or both of the coequal goals or the implementation of government-sponsored flood control programs to reduce risks to people, property, and state interests in the Delta. (California [Water Code section 85057.5](#)).

209 This report summarizes a Delta ISB review of how adaptive management is
210 currently being conducted in the Delta. We also offer our perspectives and
211 recommendations on how adaptive management can be incorporated into programs more
212 effectively to become an integral part of managing land, water, and other natural
213 resources in the Delta. We are scarcely the first to advocate the use of science-based
214 adaptive management in the Delta. In *The State of Bay-Delta Science, 2008*, Healey
215 (2008) emphasized the value of adaptive management in addressing complex, “wicked
216 problems.” In 2009, the Bay Delta Conservation Plan Independent Science Advisors on
217 Adaptive Management² reviewed adaptive management in the Delta. Their findings and
218 recommendations remain pertinent.

219

220 We emphasize at the outset that many agency staff, practitioners, and decision-
221 makers in the Delta recognize the importance of adaptive management and appreciate the
222 value of basing management practices and decisions on a solid foundation of science,
223 data, knowledge, and experience. Many individuals and programs would like to manage
224 their activities adaptively, yet they find it difficult to do so. Accordingly, in this report we
225 consider how adaptive management is perceived and used in the Delta and how its
226 application might be made more efficient and effective. Several efforts are already
227 underway to develop systematic approaches to adaptive management in the Delta under
228 the auspices of the Delta Science Program (DSP), the Collaborative Science and
229 Adaptive Management Program (CSAMP), and the Collaborative Adaptive Management
230 Team (CAMT). These activities may provide a foundation for building a more
231 comprehensive and effective framework for adaptive management.

232

233 Unlike other reviews that the Delta ISB has undertaken, our focus here is on the
234 process of adaptive management itself, rather than on the specifics of the science that
235 supports adaptive management in the Delta. There already exists a large body of
236 scientific understanding and knowledge that provides a basis for adaptive management,
237 and it clearly identifies the science needs, especially in monitoring and modeling, for
238 effective application of this approach.

239

240 **The Review Process**

241

242 Our assessment of adaptive management in the Delta is based on the results of a
243 questionnaire (Appendix C) distributed to several agencies, in-person interviews with
244 individuals directly involved in managing the Delta and its resources, a review of
245 pertinent scientific and management literature, and comments from the public on a draft

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http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Independent_Science_Advisors_Report_on_Adaptive_Management_-_Final_2-1-09.sflb.ashx.

246 report. Respondents to the questionnaire and individuals interviewed are listed in
247 Appendix D. The responses to our questions were thoughtful, detailed, and candid, and
248 we much appreciate the willingness of many people to help us understand how and why
249 adaptive management seems to be such a hard thing to do in the Delta.
250

251 We used this approach because so little is documented about how adaptive
252 management is actually done in the Delta. Moreover, we felt that evaluating impressions
253 and perceptions of adaptive management by the professionals doing management in the
254 Delta may reveal needs and solutions to adaptive-management implementation and
255 challenges. Public comments also provided new information and prompted additional
256 thought about some topics.
257

258 The raw materials for this report are the responses, comments, and insights
259 provided by the individuals and groups we consulted. Throughout this report we indicate
260 direct, verbatim quotes from questionnaire respondents or interviewees (without naming
261 them) in *italics*.
262

263 **The Sections**

264

265 To provide context, we begin with a brief background on adaptive management:
266 what it is, when it may be most useful, and what factors have limited its applications.
267 Additional background on adaptive management may be found in the cited references and
268 suggested readings listed in Appendix A.
269

270 We then describe how adaptive management is perceived by the interviewees. We
271 follow with a more detailed treatment of how adaptive management is or is not
272 implemented in the Delta, organized by the nine steps of the process described in the
273 Delta Plan. We then comment on factors that seem to constrain or impede the application
274 of adaptive management in the Delta. After this, we take a broader view of adaptive
275 management: how it might be streamlined; how it can be more responsive to changes in
276 the physical, ecological, and social environments; and what “best available science”
277 really means in the context of adaptive management. We conclude by suggesting a path
278 forward, offering recommendations for what is needed to make adaptive management
279 more achievable and effective in the Delta, proposing some immediate actions, and
280 offering some brief concluding comments.
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283 **II. Some Context**

284

285 **What is adaptive management?**

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“Most substantive environmental management decisions are iterative. There are precious few that will not be reviewed at some point in the future, and for which learning about key uncertainties is not a key priority” (Gregory et al. 2012: 254). This statement captures the essence of adaptive management. “Adaptive management” was first articulated as a science-based approach to resource management by C.S. “Buzz” Holling and Carl Walters in the 1970s and 1980s (Holling 1978, Walters 1986). Since then, it has been incorporated into statutes at local to international levels. It is now the approach advocated by many agencies and organizations to deal with complex environmental-management problems. The words “adaptive management” are used effortlessly by politicians, bureaucrats, administrators, managers, and scientists, all presuming that they are talking about the same thing. We have found that this is not the case.

So we begin with definitions. The Delta Reform Act defines adaptive management as: “a framework and flexible decision-making process for ongoing knowledge acquisition, monitoring, and evaluation leading to continuous improvements in management planning and implementation of a project³ to achieve specified objectives” (Water Code section 85052). More simply, adaptive management can be thought of as a structured approach to management and decision-making that accumulates and incorporates knowledge to reduce uncertainty (Gregory et al. 2012).

Adaptive management is a proactive approach to taking risks, anticipating that plans may often not turn out as intended, having a backup plan(s), and continuing to monitor and evaluate progress toward goals. It provides a pathway for undertaking actions when knowledge about a system is incomplete and for modifying the approach as knowledge is gained and uncertainty is reduced. In short, management involves making decisions; adaptive management focuses attention on how the decisions are made using available knowledge and learning over time.

There is nothing mystical about adaptive management; in a sense, it is something we all do often. We may have planned a schedule but, unexpectedly, the bus is late or an appointment cancelled. Based on our experience and evaluation of options, we modify our schedule as new circumstances arise and carry on. Finding that the grocer is out of our favorite pasta, we substitute or plan something else for dinner. If our vacation plan calls for visiting a museum that is closed for renovation, we improvise. The success of

³ There is some ambiguity about the term “project,” which may refer formally to a defined activity, usually with designated funding and a defined start and end date, or more informally to a general area of ongoing activities. We use “project” in the former sense and “management action” or “action” for the latter. “Program” is a broader level that may include several projects.

321 evidence-based medicine is based on accumulated experience, learning, and continuing
322 evaluation of outcomes. Surgeons in an operating room rely on this knowledge to adapt
323 when something unexpected happens; therapeutic protocols such as chemotherapy are
324 based on similar evidence and experience. Engineered structures often change from initial
325 designs as construction occurs and users modify their requirements and expectations.

326

327 Adaptive adjustments such as these are expressed on a continuum, from the *ad*
328 *hoc* adaptations we make almost automatically, to the more systematic knowledge-based
329 decisions of a surgeon, to the structured decision-making process called for in the Delta
330 Reform Act. The power of adaptive management in managing environmental resources
331 increases as we move toward the structured, science-based end of this continuum.

332

333 In its management applications, adaptive management is the antithesis of dogged
334 implementation of previously planned management actions even after it becomes
335 apparent that they are not having the desired effects.⁴ In contrast, adaptive management
336 fosters flexibility in management actions, but it does so through an explicit, structured
337 process. It entails having clearly stated goals, identifying alternative management
338 practices or objectives, framing hypotheses about cause and effect, systematically
339 monitoring outcomes, learning from these outcomes, sharing information with key
340 players and decision-makers, and being flexible enough to adjust management practices
341 and decisions in light of what is learned. It involves planning ahead for surprises, doing
342 the monitoring and analyses to see what's coming, and having a Plan B (and then Plans
343 C, D, ...) ready and waiting to implement. Computer models often are used in adaptive-
344 management to integrate available knowledge and, as learning occurs, to provide
345 synthesis and a means of developing and exploring promising management actions before
346 they are attempted as field experiments or pilot projects.

347

348 Adaptive management is most powerful in reducing uncertainty when
349 management actions are thought of as experiments. By using a design that includes
350 appropriate controls, monitoring, and replication, the factors that produced the observed
351 outcomes can be disentangled from a variety of potentially confounding factors. As a
352 result, one can have a good idea of *why* a management action did or did not work as
353 expected. For example, restoration of the Tijuana Estuary in southern California involved
354 partitioning the area into a series of modules that could be subjected to different,
355 replicated experimental treatments (e.g., planting of different combinations of marsh
356 plants). The results could then be used to adjust subsequent restoration efforts (Zedler and
357 Callaway 2003). Williams and Brown (2014) describe four case studies of successful

⁴ What might be described as the “Damn the torpedoes, full speed ahead” approach to management, often the easiest approach for institutions and programs, and for managers nearing retirement age.

358 adaptive management, and the South Bay Salt Pond Restoration Project described in Box
359 1 (page 17) provides an example closer to home.

360

361 However, in many cases only a single action can be undertaken at a single place
362 and time, and replication is not possible. Therefore, the best one can do is to monitor the
363 previous and subsequent states of the system being managed. Adaptive management may
364 still be used in such situations if the basic requirements noted above—setting goals,
365 monitoring, learning, and flexible decision-making—are met. It may be useful to use
366 existing data and knowledge to conduct a “what if” thought experiment in developing
367 possible scenarios and outcomes, perhaps using computer simulation modeling.
368 Experience has shown that experiments don’t have to be conducted in the field to be
369 informative.

370

371 **When is adaptive management most useful?**

372

373 The Delta Reform Act requires the use of adaptive management for science-based
374 management of the Delta and its resources. Conducting comprehensive adaptive
375 management, however, can be demanding, expensive, time-consuming, and politically
376 sensitive. Adaptive management should not be undertaken if there is no opportunity to
377 apply what is learned, if there is little uncertainty about what actions to take or their
378 outcomes, or if there is little agreement among parties about goals and objectives
379 (Gregory et al. 2006, Williams and Brown 2012, 2014). Adaptive management is most
380 likely to be useful and effective when:

381

- 382 1. There is considerable uncertainty, making it difficult to predict with confidence
383 the outcomes of management actions but actions must nonetheless be taken (i.e.,
384 waiting for better knowledge is not an option);
- 385 2. The system is complex and nonlinear, which means that many direct and indirect
386 pathways can affect outcomes, identifying cause(s) and effect(s) is difficult, and
387 the system being managed may veer in unexpected directions in response to
388 management actions and other factors;
- 389 3. The system is changing rapidly, which means that the conditions when the desired
390 outcomes are expected may differ from those when the management actions are
391 first applied;
- 392 4. There is potential to learn (and reduce uncertainty) by observing and recording
393 what happens in response to management actions;
- 394 5. Costs, benefits, and risks can be assessed and balanced quantitatively;
- 395 6. There are technical and institutional means to incorporate what is learned to
396 improve management practices;

- 397 7. The management actions do not have irreversible long-term effects on the system
398 and management is flexible. In contrast, if an action results in a permanent or
399 long-term alteration of the system (e.g., construction or removal of a dam,
400 installation of a large pumping station, filling a wetland, or extinction of a
401 species), the flexibility to adapt is foreclosed; and
- 402 8. Stakeholder and institutional support is sufficient and flexible enough and
403 stakeholders and decision-makers buy into the process.
404

405 The upshot is that adaptive management is more useful in some situations than in
406 others, and sometimes it may be inappropriate or not feasible. We return to consider such
407 situations in Section VII.
408

409 **Some Examples**

410

411 Despite the incorporation of adaptive management into the guidelines for many
412 governmental agencies and the hundreds of papers and books written on the subject,
413 actual examples of successful adaptive management are surprisingly (and distressingly)
414 rare. For example, of the 1,336 published papers dealing with adaptive management and
415 biological systems reviewed by Westgate et al. (2013), fewer than 5% explicitly claimed
416 to do adaptive management, and of these less than a dozen actually met their strict criteria
417 for adaptive management.
418

419 Several management or restoration projects show both the promise and the
420 difficulty of conducting adaptive management in large, complex ecosystems. For
421 example, ecological restoration in San Diego Bay provides a model of many of the
422 elements of effective adaptive management (Zedler and Callaway 2003). Restoration was
423 prompted by the need to mitigate damages from highway and flood-channel construction
424 and to provide habitat for endangered species. The work entailed close collaboration of
425 scientists with state and federal agencies. Frequent meetings helped to ensure that
426 information was shared among all parties. Restoration actions, standards, and eventually
427 the design of the mitigation program itself were adjusted based on the results of
428 ecosystem monitoring.
429

430 In other cases, the goals are long-term and the process is still underway. The Delta
431 Plan used restoration of the Kissimmee River in Florida as an example of adaptive
432 management (see Dahm et al. 1995). Although this project involves planning, design,
433 monitoring, and evaluation, it is not structured as an experiment. In contrast, the Glen
434 Canyon Dam Adaptive Management Program adopted an explicit experimental approach,
435 using controlled flows from dam releases to assess options for restoring sand-bar habitat
436 below the dam and protecting endangered fish in Grand Canyon. The Program includes

437 both management and technical working groups; the Grand Canyon Monitoring and
 438 Research Center (USGS) provides science support to monitor and assess ecological
 439 responses to the experimental flows (National Research Council 2004, Melis et al. 2005).
 440 Restoration of the Everglades is also often cited as an example of adaptive management
 441 of a complex ecosystem (see Gunderson and Light 2006; National Research Council
 442 2004, 2014; Convertino et al. 2013). Doremus et al. (2011) and LoSchiavo et al. (2013)
 443 provide summaries of what has been learned so far. Because there are close parallels
 444 between restoration efforts in the Everglades and adaptive-management challenges in the
 445 Delta, we include a synopsis from Doremus et al. (2011) as Appendix B.

446
 447 The Rio Condor Project in Chile illustrates both the potential and possible reasons
 448 for failure of planning for adaptive management. In 1993, The Trillium Corporation
 449 purchased some 272,000 hectares of forested land in Tierra del Fuego. The intent was to
 450 integrate sustainable production of valuable forest products on a grand scale with
 451 conservation and ecotourism; Lindenmayer and Franklin (2002) provide details on the
 452 early history of the project. After extensive design and planning (and navigating several
 453 legal and bureaucratic challenges), the Rio Condor project was implemented in 1999. The
 454 design incorporated extensive monitoring and scientific research to support a rigorous
 455 adaptive-management process that included experimental testing of both forest-
 456 management and conservation-practice hypotheses, with periodic evaluation by outside
 457 experts. With a background like this, what could go wrong?

458
 459 The answer, as is most often the case, was funding. Trillium had underestimated
 460 costs and overestimated returns, and defaulted on the loans to purchase the lands in 2002.
 461 So much for the adaptive-management plan! Goldman Sachs then stepped in to acquire
 462 the defaulted loans, donating the area to the Wildlife Conservation Society in 2004.
 463 Renamed Karukinka Natural Park, it now serves multiple conservation functions,
 464 including assessing carbon benefits, protecting populations of guanaco (*Lama guanicoe*)
 465 and several endangered species, and promoting ecotourism.⁵ Although the outcome
 466 differed from the initial plan, the effort succeeded in meeting the different, adaptively
 467 revised, objectives.

468

469 **What factors limit the use of adaptive management?**

470

471 Why are there so few examples of successful adaptive management? As in the
 472 Rio Condor example, the funding needed to support the phases of adaptive management

⁵ <http://www.wcs.org/saving-wild-places/latin-america-and-the-caribbean/karukinka-landscape-chile.aspx>

473 is often not secure.. But there are numerous other barriers (see Gregory et al., 2006, Lund
474 and Moyle, 2013, Williams and Brown, 2014, and page C-4 in the Delta Plan).

475

- 476 1. Understanding complex systems requires multiple disciplines that are typically
477 housed in different agencies and have different responsibilities, different
478 priorities, and different approaches; transcending these boundaries is difficult;
- 479 2. Uncertainty about the response of complex systems to multiple factors often leads
480 to a hesitancy to move forward on adaptive management once a management
481 decision is made;
- 482 3. Mechanisms and approaches for designing and implementing large-scale
483 ecosystem experiments are not well-developed;
- 484 4. Support for adaptive management and its goals may shift with the political winds,
485 creating administrative uncertainty that inhibits implementation;
- 486 5. Managers are often risk-averse, and consequently are reluctant to take actions that
487 might not work as planned and could be regarded as “failures”;
- 488 6. Key stakeholders have not been involved in the planning and design of a
489 management action, do not understand the underlying rationale, have different
490 interests and priorities, and consequently do not buy into the process;
- 491 7. Regulations (e.g., restrictions under the Endangered Species Act) may limit
492 experiments or data gathering (although such activities may be undertaken if they
493 are included in the authorized actions; that is, they are planned in advance);
- 494 8. The need to obtain multiple permits from multiple entities to conduct complex
495 adaptive management can cause delays, during which time the system changes,
496 requiring adjustment of plans or goals, which may then require additional
497 permitting;
- 498 9. Human resources (i.e., expertise, time) needed to plan, implement, monitor, or
499 evaluate the actions and outcomes are not available; and
- 500 10. Communication among all parties, especially among scientists, managers,
501 decision-makers, and stakeholders, is not accorded a high priority.

502

503 Another example—the South Bay Salt Pond Restoration Project in San Francisco
504 Bay (Box 1)—illustrates how these factors can be addressed in planning and
505 implementing adaptive management. In general, however, these barriers impede
506 implementation of adaptive management; unless they can be resolved, adaptive
507 management will continue to be a fine-sounding aspiration that is rarely realized. We
508 offer further comments on the major impediments to implementing adaptive management
509 in the Delta in Section VI.

510

511

512 **Box 1. Adaptive Management in the South Bay Salt Ponds Restoration Project⁶**

513 **[put in box]**

514

515 In 2003, state and federal agencies acquired 6,110 ha of solar evaporation salt
 516 ponds at the south end of San Francisco Bay from Cargill, Inc. The South Bay Salt Pond
 517 Restoration Project (the Project) was soon established to restore and enhance wetlands
 518 while providing wildlife-oriented recreation and flood management. Adaptive
 519 management is a central element of the project.⁷ This itself is unsurprising; proposing
 520 adaptive management is now *de rigueur* for almost any large environmental project.
 521 What is noteworthy is that adaptive management is actually being used effectively in
 522 managing this large and complex restoration project. There are lessons in this for
 523 overcoming impediments to implementing adaptive management in the Delta.

524

525 Several features of adaptive management in the Project stand out, particularly against
 526 the backdrop of the narrative elsewhere in our report:

527

- 528 1. Adaptive management was incorporated into Project planning from the beginning
 529 and figured prominently in the Project EIS/EIR;
- 530 2. Management of the Project is explicitly collaborative, involving the California
 531 State Coastal Conservancy, the U.S. Fish and Wildlife Service, the California
 532 Department of Fish and Wildlife, local flood control and water agencies, and non-
 533 profit organizations. Communication among these entities, and with scientists,
 534 managers, and stakeholders, is a regular activity;
- 535 3. Project participants identified key uncertainties (all of which incorporate the
 536 overarching uncertainty of climate change) early in the planning. Specific studies
 537 have been designed and conducted to address these key uncertainties as
 538 restoration actions have been implemented;
- 539 4. Models and experiments have been used to test hypotheses and reduce
 540 uncertainties, in some cases leading to changes in restoration and management
 541 practices⁸;
- 542 5. Monitoring has been, and continues to be, used to assess both ecological
 543 responses (e.g., bird use of managed and unmanaged ponds) and compliance (e.g.,
 544 water quality); the results have been used to inform management decisions; and
- 545 6. Each restoration target has a management trigger for action if the system is not
 546 meeting specified expectations; if this happens, a list of potential actions is
 547 already in place to guide adaptive responses.

⁶ Thanks to Laura Valoppi (USGS) for providing this example.

⁷

[http://www.southbayrestoration.org/pdf_files/SBSP_EIR_Final/Appendix%20D%20Final%20A
MP.pdf](http://www.southbayrestoration.org/pdf_files/SBSP_EIR_Final/Appendix%20D%20Final%20A%20MP.pdf)

⁸ http://www.southbayrestoration.org/science/adaptive_management_in_action.html

548
549 Incorporating adaptive management into plans is only part of the challenge. To
550 implement adaptive management requires addressing the impediments noted in Section
551 VI. How has this been done in the South Bay Salt Pond Restoration Project?
552

- 553 1. Aversion to taking risks. The restoration actions are phased over 50 years, so
554 some risks can be taken in the early stages because there is time to make
555 corrections in later phases;
- 556 2. Typical slowness. The Project Lead Scientist can quickly relay preliminary
557 scientific findings to the management team and management changes to
558 researchers without waiting for work reports to be published. Topic-specific
559 work groups of researchers and managers discuss the latest data and management
560 challenges;
- 561 3. Regulatory requirements and delays. To anticipate potential regulatory or
562 permitting hurdles, Project participants meet annually with regulators to apprise
563 them of results from the current year's actions and discuss management actions
564 planned for the coming year;
- 565 4. Perceptions about monitoring. By building an adaptive-management process into
566 the Project at the outset, the importance of monitoring has been made clear;
567 monitoring is designed to address specific management questions, reinforcing its
568 relevance;
- 569 5. Communication gap. The Project Lead Scientist is part of the management team
570 and the point person for explaining the results of scientific studies (appropriately
571 translated) and Project progress to diverse audiences;
- 572 6. Insufficient and undependable funding. The Project is not immune to funding
573 challenges; researchers and managers work together to obtain grants and other
574 funding. The multi-agency management of the Project facilitates these efforts; and
575 7. Accelerating pace of environmental change. Pre-restoration studies provide a
576 baseline for gauging future change, and restoration sites are compared with
577 reference sites to separate the effects of environmental change from restoration
578 actions. A BACI (before-after-control-impact) design is used whenever possible,
579 with strong statistical study designs. Models project that sea-level rise will
580 accelerate after mid-century; in anticipation, managers have begun to bring in
581 clean fill and reuse dredged sediments in the restoration design and are trying to
582 increase conversion of ponds to marsh.

583
584

[box ends here]

585 III. General Responses

586

587 To get a sense of how respondents to the questionnaire viewed adaptive
588 management, we initially presented a series of statements to be rated on a scale of 1
589 (strongly disagree) to 5 (strongly agree). These statements were modified from a
590 nationwide survey of adaptive management reported by Benson and Stone (2013). The
591 results are tabulated in Appendix E and are summarized here.

592

593 Respondents generally agreed that adaptive management requires a high degree of
594 collaboration, that conceptual models should include social, political, and economic
595 factors as well as ecological factors, and that it is important to communicate the results to
596 stakeholders. However, there was less agreement on whether baseline information about
597 the Delta is usually gathered or conceptual models are usually built before action is
598 undertaken; the degree to which results from monitoring and assessment are used in
599 decision-making; and whether adaptive management leads to changes in management and
600 actions. There was still greater variation in responses to other questionnaire statements—
601 some agreed, others disagreed about whether their agency did or did not use adaptive
602 management; whether the agency’s management was flexible enough to do adaptive
603 management; whether laws and regulations did or did not restrict management options;
604 and whether laws and regulations could be changed to make adaptive management more
605 successful.

606

607 The strongest, most uniform response we received, however, was disagreement
608 with the statement that “Monitoring is adequately funded to support adaptive
609 management.” This concern emerges often in this report and is considered it further in
610 Section VI.

611

612 IV. Perceptions of Adaptive Management: How is it Useful?

613

614 If adaptive management is not perceived to be useful, then it will not become a
615 common practice, even in situations that cry out for an adaptive-management approach.
616 Several individuals questioned whether adaptive management really yields any benefits
617 beyond those of normal, non-adaptive management. For example, one respondent
618 wondered whether “*the results of adaptive management are worth the effort*” and another
619 asked, “*Does the cost and effort to implement adaptive management take resources away*
620 *from implementing the actual project?*”

621

622 Most of the people we surveyed, however, saw value in at least some elements of
623 the process, if not in the entire process itself. They recognized the potential for adaptive
624 management to promote discussion among parties with opposing views, clarifying the

625 problem to be solved, and articulating the decisions that need to be made. For example,
626 adaptive management can help to identify areas and sources of uncertainty and target
627 where additional research or knowledge is needed. In this way, the process emphasizes
628 the importance of an “*upfront investment in knowledge*” to increase the likelihood that the
629 actions will yield the desired results and prompt discussion of how this knowledge can
630 inform decisions. Moreover, by developing hypotheses of how and why a system might
631 respond to management actions, the process can help to determine “*What does one do at*
632 *a fork in the road?*” The conceptual framework or model developed as part of adaptive
633 management can focus thinking about an action and its possible outcomes and ensure that
634 scientific guidance is part of the process. Moreover, this approach can help to identify
635 why things might not have worked as planned and provide the basis for a more
636 mechanistic understanding of the issues of concern. By using this approach, costs to the
637 public from misdirected actions may actually be reduced.

638

639 Adaptive management also can provide insights into causes of ecological changes
640 and system linkages beyond the object(s) of management interest, such as whether there
641 is a need to examine other stressors and connectivity pathways. In practical terms, it can
642 be used to determine which disciplines or agencies need to be involved to address a
643 problem or to engage in collaborative work on a project. Consequently, it can help to
644 avoid mistakes that might result from a failure to consider a full range of system
645 dynamics and mechanisms. Finally, some respondents felt that adaptive management can
646 facilitate communication by transmitting scientific knowledge about a system and its
647 performance to managers and policy makers.

648

649 These and other responses demonstrate broad recognition among Delta scientists
650 and managers that adaptive management can aid in identifying knowledge gaps and
651 sources of uncertainty; using knowledge about the Delta to consider alternative courses of
652 action; fostering clarity and transparency in developing management plans and making
653 decisions; understanding and anticipating how a system may respond to management
654 actions; identifying both direct and indirect consequences of those actions; engaging
655 multiple parties in discussions and planning; and fostering communication among
656 scientists, managers, and decision-makers.

657

658 At a conceptual level, then, most people who responded to the questionnaire or
659 interviews believe they have a general understanding of what adaptive management is
660 and how it can benefit management. The real questions are whether this understanding
661 translates into actually *doing* adaptive management in the Delta and, if not, what factors
662 impede the implementation of adaptive management?

663

664 **V. Implementation of Adaptive Management: How is it Being**
665 **Done?**
666

667 One questionnaire respondent stated that “*We include actions to conduct studies*
668 *and monitoring to resolve uncertainties and to verify assumptions made in establishing*
669 *standards, limits, or performance measures, and also consider opportunities to revisit*
670 *and revise decisions, pathways, and milestones based on new information or unforeseen*
671 *circumstances.*” This report would be unnecessary if this process were widespread in the
672 Delta. But it isn’t. Adaptive management in the Delta is frequently talked about, is often
673 claimed to be used, but is rarely implemented as a rigorous, science-based process that
674 incorporates structured decision-making, triggers for actions, and stakeholder
675 involvement.

676
677 Results from a survey by the Delta Science Program illustrate this point. In 2011,
678 when the implications of the Delta Reform Act were just beginning to become apparent,
679 the Program surveyed state and federal agencies and several non-governmental
680 organizations on whether they were including adaptive management in their programs.⁹
681 Of the 46 programs surveyed, 7 had no response as to whether they used adaptive
682 management, 10 indicated that they did not use it, 8 said they planned to use it sometime
683 in the future, and 21 claimed to use it in some form. The latter responses, however,
684 included such things as managing program administration to respond to change, using
685 data to make decisions, reviewing programs for performance, or adjusting programs on
686 the basis of experience. In other words, almost anything that might lead to change in a
687 program was regarded as adaptive management.

688
689 It is apparent from the 2011 report and our recent surveys and interviews that an
690 understanding of what “adaptive management” is varies substantially and is very much in
691 the eye of the beholder. Different agencies and programs often perceive adaptive
692 management in multiple ways and modify their definition and approach to suit their
693 purposes. One interviewee observed that “*there is no agreement about what adaptive*
694 *management is, but everyone thinks they are doing it.*” Consequently, actions such as
695 adjusting releases of cold water from dams to foster movement, survival, or migrations of
696 salmon, flooding agricultural fields in autumn to provide habitat for migratory shorebirds
697 and waterfowl, or reducing water exports at pumping stations to prevent entrapment of
698 smelt and other fish may be adaptive management to some people but routine
699 management decisions to others. These are examples of adjusting actions to fit

9

http://www.deltacouncil.ca.gov/sites/default/files/documents/files/DISB_on_the_DSP_January_2012_v2.pdf

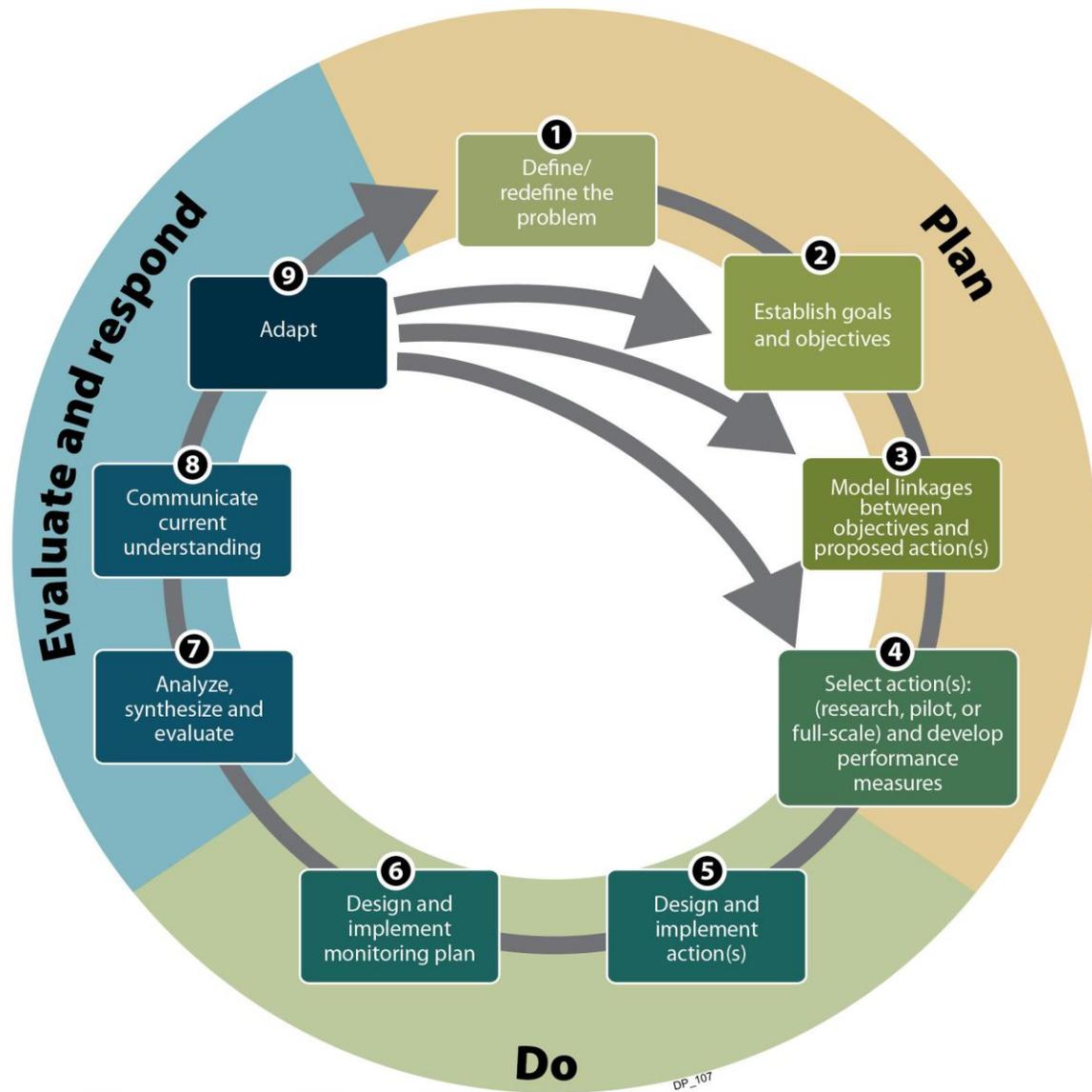
700 circumstances—managing adaptively—and they are often based on past experience. But
701 they are not the sort of structured decision-making embodied in the description of
702 adaptive management in the Delta Plan. Although these actions may be appropriate in
703 fulfilling particular management needs, the implication that these might be a structured,
704 adaptive-management approach is not justified. Divergence of approaches and
705 interpretations may impede the communication and collaboration needed for effective
706 adaptive management of the Delta.

707

708 To clarify and standardize how adaptive management should be structured, the
709 Delta Plan describes a cyclic, nine-step process (Fig. 1). Many versions of the adaptive-
710 management cycle exist in the literature, embodying anywhere from three to more than a
711 dozen steps, with some depicting a circular sequence and others a web of interacting
712 processes (see, for example, Healey, 2008, Murphy and Weiland, 2014, and Williams and
713 Brown, 2014). However, all are founded on science and all involve the same basic
714 activities: *Plan* (identify the problem and design the management approach(es)); *Do*
715 (implement the management action(s) and monitor the results); and *Evaluate and respond*
716 (analyze and synthesize the results, communicate the findings to appropriate parties, and
717 make any necessary adjustments). In fact, a distinguishing feature of structured adaptive
718 management is the importance of the initial planning phase, which is fully as important as
719 implementation and evaluation. As Murphy and Weiland (2014: 206) observed,
720 “Adaptive management requires a demanding upfront approach that emphasizes the
721 production, critical assessment, and appropriate interpretation of scientific information
722 throughout the adaptive-management process.”

723

724



725
726
727
728
729
730
731

Figure 1. The nine-step framework for adaptive management depicted in the Delta Plan. Boxes represent steps in the process, and the circular arrow represents the general sequence of steps. The additional arrows indicate possible next steps to address the problem or revise the selected action based on what has been learned.

732 To assess perceptions about the nine-step approach, we asked questionnaire
733 respondents and interviewees to comment on how the nine steps are expressed in
734 practice; the discussions and implications for management in the Delta are
735 summarized for each step below.
736

737 **Define/redefine the problem**

738

739 It is hard to imagine that a management action would be planned or undertaken
740 without knowing the problem to be addressed. Disagreements and uncertainties are
741 worsened if the problem is not clearly defined. While it is not always necessary that
742 everyone involved in a project sees the problem in the same way, such differences should
743 be openly discussed before a project begins. And while defining the problem is the
744 starting point for effective management, simply defining the problem is not enough.
745 Major underlying causes should be identified and ideally framed as testable hypotheses.
746

747 Everyone we interviewed considered that their work begins with a clear
748 understanding of the problem. A clear definition of the problem can indicate at the outset
749 the array of collaborators needed to address the problem and can establish the baseline
750 conditions for management against which progress (or at least change) can be measured.
751 Often, however, the problem is defined by entities other than those designing and doing
752 the management. As one respondent observed, "*We are typically told what the 'problem'*
753 *is by other agencies. Our job is to figure out how to fix the problem.*" In at least some
754 cases, the problem statement is accompanied by an identification of key uncertainties,
755 which helps define knowledge gaps that need to be filled. Appropriately, the problems
756 are defined by perceived management, political, or societal needs rather than scientific
757 needs. The role of science, after all, is to help address the specified problem in a rigorous
758 way, so that "*the science should be relevant to the problem.*"

759

760 Overall, our impression is that the various agencies and programs do a good job,
761 individually, of framing the problem (even if it is not "their" problem), in many cases
762 setting the stage for subsequent steps in adaptive management. Sometimes there is clear
763 coordination and collaboration among agencies or entities to address a common problem,
764 although this is not as prevalent as it should be.
765

766 **Establish goals and objectives**

767

768 Clear goals and objectives are essential to adaptive management; as Yogi Berra
769 once observed, "If you don't know where you are going, you'll end up someplace else."
770 Differing values and priorities among stakeholders can stymie clearly stated management

771 objectives (as the did for the Everglades Adaptive Management Program; National
 772 Research Council 2004). Clear goals and objectives reduce reliance on subjective
 773 feelings that “things just aren’t right” or “this isn’t working” and management can move
 774 forward.

775

776 Most problems are considered in terms of outcomes; managers “*look first at the*
 777 *outcomes and then ask what is needed to ensure getting there.*” The desired outcomes, in
 778 turn, dictate what performance measures will be used to determine the “success” of a
 779 program (and thus the need to adaptively manage). When the goals and objectives are set
 780 by administrative or regulatory criteria (e.g., meeting water-quality standards or permit
 781 specifications), as is often the case, the targets or outcomes of actions are clearly
 782 specified but the mechanistic understanding of causes needed to conduct adaptive
 783 management (*why* did the actions produce the observed outcomes) may remain elusive.
 784 Some programs and agencies are able to identify ecologically sensitive performance
 785 measures (e.g., juvenile fish migration survival rates, spawning density, dissolved
 786 oxygen), but obtaining detailed information on such measures is often difficult. As one
 787 respondent commented, “*Performance measures have generally been established in*
 788 *federal ESA biological opinions or State water rights decisions and are often too broad,*
 789 *too difficult, and too costly to measure.*”

790

791 This statement highlights the challenge faced by scientists, managers, and
 792 decision-makers in the Delta. It is important to frame clear goals and objectives that are
 793 relevant to the State’s coequal goals of managing for both water reliability and Delta
 794 ecosystems. However, if progress toward meeting those goals and objectives cannot be
 795 assessed because the outcomes are difficult to measure (e.g., juvenile fish survival) or the
 796 indicators are not directly related to the goals (e.g., salinity at some locations), it will be
 797 difficult to determine whether it is appropriate to stay the course of action or adaptively
 798 change practices.

799

800 Overall, all of the people we interviewed felt that their programs and agencies
 801 have a clear sense of their goals and objectives, even though they often struggle with
 802 meeting objectives that are not their own and are under constraints that limit their ability
 803 to measure progress toward meeting those objectives.

804

805 **Model linkages between objectives and proposed action(s)**

806

807 The third step in the adaptive-management process in Figure 1 entails modeling.
 808 To model, or even to think about how proposed actions might address a problem to attain
 809 goals and objectives, requires knowledge—information about what is to be managed,
 810 how it may respond to actions, and what factors or contingencies might affect outcomes.

811 Much of this information can be gleaned from what has been learned in other current or
812 past projects, whether in the Delta or elsewhere. Adaptive management relies on both
813 conceptual and quantitative models. Modeling without such background knowledge may
814 end up being detached from reality and less likely to produce practical guidance.
815

816 How is modeling used to support management in the Delta? These responses are
817 typical of what we heard: “*We use conceptual models to guide our understanding of the*
818 *complex nature of ecological systems and to help identify data gaps*” and “*We ultimately*
819 *decide which models to use based on the state of the science, availability of appropriate*
820 *models and modeling expertise, cost/benefit of modeling versus not modeling an action,*
821 *and project budget.*” There is also a general recognition of the need to develop
822 quantitative modeling expertise and tools to implement adaptive management and
823 balance long-term benefits against short-term costs. Even when quantitative models are
824 used, however, there is often little follow-up and no adjustment of models based on new
825 information. Developing quantitative models that capture the complexity of Delta
826 systems requires staff well-versed in systems thinking, data analysis and management,
827 and modeling. Such staff are difficult to attract and retain and “*are often pulled off to*
828 *address immediate needs.*”
829

830 While most respondents use conceptual models and recognize at least the
831 desirability of more quantitative systems models, others question the value of modeling
832 in addressing problems in the Delta. There is a perception among some that even
833 conceptual modeling may not be needed to conduct adaptive management, particularly
834 when the ecological or physical processes are well known: “*we need to ask what a model*
835 *can tell us that we don’t already know that will add value to management.*” As one
836 respondent put it, “*we model to exhaustion, modeling begets more modeling.*” Another
837 noted that “*having models is great, but not at the expense of delaying action.*”
838

839 Thus, while many individuals and entities working in the Delta embrace (albeit
840 sometimes reluctantly) the role of modeling and its value in organizing thinking,
841 identifying critical uncertainties, and communicating options to decision-makers, others
842 prefer to base their actions instead on experience, expert opinion, or intuition. Although
843 sophisticated quantitative modeling is not necessary in all situations, we believe that
844 conducting adaptive management in a complex, multivariate system must at a minimum
845 entail the development of a comprehensive conceptual model, organized in relation to the
846 overall problem being addressed, the goals and objectives, the uncertainties involved, and
847 the desired or anticipated outcomes. In developing guidance for ecosystem restoration for
848 the Army Corps of Engineers, for example, Fischenich et al. (2012) suggested that
849 conceptual models for adaptive management should (1) identify causes of degradation
850 (i.e., the problem); (2) indicate how causal factors influence key system components; (3)

851 indicate how management can reduce stresses or restore the system (i.e., meet the
852 objectives); (4) incorporate hypotheses to be tested; and (5) indicate what needs to be
853 monitored, why, and over what time frame. This guidance could be applied to many
854 projects in the Delta.
855

856 As complexity, the need for quantitative predictability, and/or the risk of
857 unintended consequences of actions increase, more sophisticated models may be needed.
858 Because such models are demanding of expertise, time, and money, they should be
859 developed in a collaborative framework. The collaborative development of CALSIM by
860 the US Bureau of Reclamation and the California Department of Water Resources is a
861 good example. More recently (May 2015), the Delta Science Program and UC Davis
862 Center for Watershed Sciences conducted a workshop on “Integrated Modeling for
863 Adaptive Management of Estuarine Systems”¹⁰ that brought together people from
864 multiple disciplines and organizations. Models may play an important role in fostering
865 inter-agency collaboration, which in turn may reveal insights or knowledge gaps apparent
866 to one agency but not to others.
867

868 Overall, we found that while there is broad acceptance of the value of conceptual
869 models, there are differences in perceptions of the usefulness or applicability of
870 quantitative modeling. Moreover, neither of these types of models is routinely adjusted as
871 new information becomes available.
872

873 **Select action(s): (research, pilot, or full-scale) and develop performance** 874 **measures**

875
876 Adaptive management often identifies alternative actions that might be
877 undertaken to address a problem. Models may help to select among these actions, but
878 uncertainty may remain about which actions will produce the desired outcomes. When
879 the actions are expensive, difficult to change, or have the potential to produce unwanted
880 side effects, additional research or a small-scale pilot study may be appropriate before
881 undertaking full action. One respondent indicated, “*if outcomes are fairly uncertain and*
882 *time sensitivity is not an issue, then a small scale implementation (pilot) study is*
883 *generally conducted before a larger scale project is undertaken.*” This generally involves
884 consultations among multiple agencies and stakeholders. Some programs use decision-
885 support tools (e.g., Delta Regional Ecosystem Restoration Implementation Plan
886 (DRERIP) Action Evaluation Procedure and Decision Support Tool¹¹) to help determine
887 what actions may be most appropriate in a particular situation. Others view conducting a

¹⁰ <http://deltacouncil.ca.gov/enewsletter/stories/july-2015/may-integrated-modeling-workshop-brought-together-international>

¹¹ http://www.dfg.ca.gov/erp/scientific_evaluation.asp

888 pilot study before full-scale action as an alternative to implementing adaptive
889 management after the action is taken—an approach that could be described as “plan, do a
890 pilot study, and then forge ahead and don’t look back.”

891

892 Understandably, people in agencies with management responsibilities in the Delta
893 feel “*the curse of the immediate*,” the push to take action without the luxury of first
894 getting more information to increase the likelihood of long-term success. Despite this,
895 some programs are committed to conducting pilot studies (and perhaps even more
896 research) when the situation warrants and when they can justify (and fund) it. In practice,
897 “*the lack of funding and staff resources for science is the primary limiting factor for*
898 *targeted research and pilot studies.*”

899

900 Clearly, information and knowledge can be obtained in many ways, and
901 additional research involving an experiment or hypothesis test isn’t always necessary for
902 adaptive management. One interviewee noted that “*management decisions are typically*
903 *made in response to regulatory requirements and to short-term crisis situations, so they*
904 *are often made without considering targeted research or adaptive management.*” There is
905 a perception that “*there is a tradeoff between implementing actions and conducting the*
906 *science to evaluate the actions,*” Research may be necessary in some situations involving
907 critical knowledge gaps or uncertainties, but several respondents questioned whether the
908 adaptive-management framework is simply another way for scientists to justify doing
909 more research. Thus, “*there should be a very clear division between adaptive*
910 *management and scientific research,*” or, more bluntly, adaptive management “*will make*
911 *projects more costly, complicated, and promote further implementation delays. In the*
912 *end, less gets done, [we] go to more meetings, the resources continue to suffer, while the*
913 *scientists wait for irrefutable answers.*” Another respondent cautioned, “*Adaptive*
914 *management should focus on finding out if the broad project objectives are being met,*
915 *not with discovering answers to detailed scientific questions.*”

916

917 There is disagreement about whether adaptive management should routinely
918 involve new scientific research, or whether it should be based on existing knowledge,
919 with research needs identified as knowledge gaps become apparent in the process of
920 implementing adaptive management. There is no single answer to this perceived
921 dichotomy. In either case, there is a risk that the research may become arduous and
922 inappropriate for aiding timely management decisions. The level of science and research
923 required should be scaled to what needs to be understood to inform management actions,
924 to the costs (in terms of time, money, and staff) of doing the research, and to the
925 likelihood that the research will significantly reduce uncertainties and enhance
926 knowledge. While the research also may contribute to fundamental (“basic”) scientific

927 knowledge, the primary focus should be on producing mechanistic knowledge related to
928 the problem.

929

930 Overall, then, there seems to be considerable angst about including additional
931 scientific research under the banner of adaptive management, even though everyone
932 seems to agree that science is central to improving Delta management and is an important
933 way to fill knowledge gaps and reduce uncertainties.

934

935 **Design and implement action(s)**

936

937 The first stage of the “Do” phase of the adaptive-management process is
938 designing actions. All of the programs we considered included the design of management
939 actions, often in considerable detail, although not always in the sequence outlined by the
940 previous four adaptive-management stages.

941

942 Differences in goals and objectives among projects often lead to divergences in
943 design. Still, most programs and agencies implement actions more or less as they were
944 designed, to achieve stated goals and objectives. Once initiated, management usually
945 sticks to the original design unless it is overwhelmingly clear that something is amiss—
946 the system is responding negatively, the environment has changed in unanticipated ways,
947 or external forces such as funding or administrative support have changed. Knowing
948 when circumstances should prompt a re-evaluation or change in actions is one of the most
949 challenging aspects of adaptive management.

950

951 Overall, we find that management actions are usually carefully planned and
952 documented (not the least because permitting often requires it).

953

954 **Design and implement monitoring plan**

955

956 To be most effective, the planning and design of actions should be developed in
957 tandem with the plan and design of monitoring—management plans and monitoring
958 design should be closely coordinated. This is especially important when the management
959 is structured adaptively as an experiment or is designed to test hypotheses. Linking
960 monitoring with the design of management actions also will help to ensure that the
961 monitoring is targeted, informative, and cost-effective rather than broad-based and
962 unfocused. One reviewer of the Draft Report summarized it this way: *“Under an
963 adaptive management regime, monitoring must be purpose oriented, address explicit
964 objectives, be capable of detecting salient environmental changes, and provide
965 quantitative results that can inform management responses.”*

966
967 Unfortunately, monitoring details “*are often worked out as the project proceeds*
968 *and funding becomes available.*” Insufficient up-front attention to the design of
969 monitoring protocols can lead to ineffective monitoring or monitoring of the wrong
970 things. If an action is designed to address regulatory needs, for example, the monitoring
971 protocols are generally not designed to answer scientific questions that would improve
972 project management or the design of future projects. Consequently, although the
973 monitoring design may tell one whether management actions have complied with
974 regulations or permit requirements, “*this monitoring data is typically useless to answer*
975 *any questions.*” Even when the emphasis is on monitoring ecosystem performance, the
976 focus tends to be on outcome measurements rather than mechanistic understanding of
977 why actions succeeded or failed.

978
979 Monitoring and data management are also inseparable. As Lindenmayer and
980 Franklin (2002) observed, “monitoring is necessary to generate the empirical data that are
981 the definitive measure of the degree to which a management program is achieving its
982 objectives.” Some respondents and interviewees reported that their data are assembled in
983 data banks or data-management systems that are available to others, although this was
984 more often than not a work in progress. In other situations, however, “*database linkages*
985 *outside individual projects are generally not worked out very well or at all.*” The
986 management of Delta data is a topic of active consideration by the Delta Science Program
987 (“Enhancing the Vision for Managing California’s Environmental Information”¹²).

988
989 Overall, programs often seem to find it difficult to maintain ongoing monitoring
990 while implementing actions, much less after the actions have been completed. Relating
991 monitoring to management actions remains a major impediment to implementing
992 adaptive management in the Delta.

993

994 **Analyze, synthesize, and evaluate**

995

996 Several respondents indicated that the analysis of the results of an action is often
997 done “*within a year or two*” of project completion or occasionally during implementation
998 of the actions if conditions warrant. Where the actions are undertaken in a regulatory
999 setting or have permitting conditions attached, however, there may be built-in
1000 checkpoints or triggers for assessing status. For example, “*when adaptive management*
1001 *triggers are met, we respond accordingly, with varying degrees of effort, detail, and*
1002 *adequacy.*” In other words, mid-project assessments are generally done to comply with

¹² <http://deltacouncil.ca.gov/docs/enhancing-vision-managing-california-s-environmental-information-final>

1003 reporting timelines and permit requirements rather than to assess whether the system is
1004 responding to management as hoped. Other respondents or interviewees said that “*the*
1005 *most common project evaluation is a qualitative assessment of whether a project has*
1006 *been implemented as designed*” or “*on the ground observations and assessment of habitat*
1007 *conditions and consideration of changes in environmental conditions are continually*
1008 *analyzed, but likely not well documented.*”
1009

1010 There seems to be a general pattern related to analysis, synthesis, and evaluation.
1011 If management actions are related to a multi-agency effort (the Interagency Ecological
1012 Program (IEP) was frequently mentioned), then prompt, ongoing, and thorough analyses
1013 may be conducted, as was the case for the Pelagic Organism Decline (POD), the
1014 Management, Analysis, and Synthesis Team (MAST), or the Fall Low-Salinity studies.
1015 More often, the burden (and it is often perceived in this way) of analysis and synthesis
1016 falls within a program or agency, and it may be delayed or not done at all unless there are
1017 specific requirements and appropriately trained and well-led staff to do so. It is important
1018 to emphasize that this is *not* a result of a disregard for the importance of analysis and
1019 synthesis or a lack of intent to do so; rather, it reflects the incessant, multiple distracting
1020 demands that are made on programs, staff, and agencies that are understaffed or lack the
1021 expertise to conduct basic data analyses. The difficulty is exacerbated when monitoring is
1022 inadequate or piecemeal, not targeted on the most appropriate variables, or the data are
1023 not managed in a way that facilitates insightful analysis.
1024

1025 In short, this phase is where the adaptive-management process, when it is actually
1026 undertaken, most often begins to break down. Failure to conduct the necessary analysis,
1027 synthesis, and evaluation of the results of management actions, particularly while the
1028 actions are underway (and thus potentially amenable to adaptive adjustment), is a major
1029 barrier to achieving adaptive management. To some degree, this situation is created by
1030 the imperative to move ahead on other actions once one project nears completion. This, in
1031 turn, reflects the perception that a project is “completed” when the action is done; as a
1032 result, analysis, synthesis, and evaluation are regarded as add-ons to be done as time and
1033 resources permit. Although it is clear that some (perhaps many) programs and agencies
1034 *want* to do the analysis, synthesis, and evaluation needed to gauge the effectiveness of
1035 their actions (and thus follow through with adaptive management), even the best
1036 intentions may be overwhelmed by the immediacy of management challenges in the
1037 Delta. Ecosystem-level, performance-based analysis and synthesis is especially important
1038 for creating an integrated system of actions over time, rather than planning opportunistic
1039 actions that tend to occur today without regard for future plans or changes.
1040

1041 Without timely analysis, synthesis, and communication, little is learned, at least in
1042 a way that can be incorporated into adaptive management. Moreover, the same mistakes

1043 may be repeated in the next project. This problem relates back to monitoring issues and
 1044 the lack of secure funding, which we discuss later in this report.
 1045

1046 **Communicate current understanding**

1047

1048 If the scientific findings and knowledge gained in the previous steps of the
 1049 adaptive-management process are not translated into clear and understandable language,
 1050 managers and decision-makers will probably not use the information to respond
 1051 adaptively.

1052

1053 Everyone we surveyed recognized the importance of communicating the results of
 1054 their actions to decision-makers, other agencies, stakeholders, and to the public. In some
 1055 cases there is frequent communication among managers and agency staff about habitat
 1056 and management conditions for a specific project. Scientific findings are generally
 1057 reported in conferences and briefings, some of which are directed toward the public.
 1058 Translation of the science, however, *“is often not done until managers/decision-makers*
 1059 *identify a specific question(s) they need answered”* and often the communication is to
 1060 upper-level administrators about budgets rather than assessing what has or hasn’t worked
 1061 or coupling the communications with informative and up-to-date performance measures.
 1062 One respondent noted *“the information that drives management decisions seems to be*
 1063 *more based in local politics and whose land is being sought after for what purposes or*
 1064 *with specific conflicts between parties that could result in lawsuits”* and another felt that
 1065 *“there has not seemed to be an interest in what science-based actions might be assisting*
 1066 *in the recovery of specific animal populations as marker of progress to species recovery*
 1067 *as it relates to water/flood/land management decisions.”*

1068

1069 Tailoring communication to facilitate adaptive management isn’t easy. The
 1070 audience interested in most projects, especially in the Delta, is diverse, with different
 1071 interests, priorities, and knowledge. Managers and decision-makers have many
 1072 responsibilities, so the challenges are to distill the results of all the previous phases of the
 1073 adaptive management process and to determine how much information, of what sort, is
 1074 needed to inform decisions. Lengthy reports or scientific papers are ineffective or are too
 1075 often and too easily ignored.¹³ The Bay Delta Conservation Plan Independent Science
 1076 Advisors on Adaptive Management (2009) recognized the need for individuals skilled in
 1077 both communication and science to translate scientific findings for managers and
 1078 decision-makers, a finding we strongly agree with.

1079

¹³ In contrast, the webpage of the South Bay Salt Pond Restoration Project is a good example of how to communicate succinctly. See

http://www.southbayrestoration.org/science/adaptive_management_in_action.html

1080 Overall, while effective and broad communication is seen as essential for adaptive
1081 management and for overall management of resources in the Delta, there is an unfilled
1082 need for an organizational structure that accommodates science communications to
1083 prepare informative briefings and understandable outreach materials as important results
1084 become available. Moreover, communication must be multi-way, with decision-makers,
1085 stakeholders, and all participants in adaptive management informing as well as being
1086 informed by others. Without broad communication of the appropriate information, the
1087 next step in the adaptive-management cycle may not occur and the process will not be
1088 successful. Consequently, attention should be given to communication when an adaptive-
1089 management plan is first being formulated, not when everything else has been done.
1090

1091 **Adapt**

1092
1093 In a broad sense, all of the previous steps in the adaptive-management process are
1094 about learning. The challenge, and the point of this step, is to put that learning into
1095 practice. As Hilborn (1992) noted, “if you cannot respond to what you have learned, you
1096 really have not learned at all.” And responding involves making decisions.
1097

1098 In our interviews with agency representatives, the questions of who makes the
1099 decisions and how they do it came up repeatedly. In some programs, the process is
1100 adaptive but informal. If the results are desirable, then the actions continue and the
1101 techniques are applied elsewhere; if not desirable, the practices are assessed and changes
1102 may occur. Evaluating what outcome is or is not desirable should be related to the initial
1103 goals and objectives, although who deems what is a desirable outcome at the end of a
1104 project may not be the same person as the one who initially framed the goals and
1105 objectives, which may have been done years earlier. Moreover, as conditions change,
1106 what looks undesirable now may look more desirable as time passes (or vice versa). One
1107 respondent mentioned that “*we need tools to assist programs to conduct that critical but*
1108 *usually missing link in the cycle: adapt and then re-evaluate and change program goals*
1109 *and objectives.*” In some instances, determining whether change is necessary may be
1110 based on the use of models to inform decision-making, although this may be slow
1111 because the data needed to run the models are insufficient. In this case, best professional
1112 judgment, stakeholder input, or external peer review may be an appropriate substitute.
1113

1114 The trickiest part of the adaptive-management process may be determining when
1115 the mismatch between the results of management actions and the original goals and
1116 expectations of a project is great enough to warrant changing the actions, models used,
1117 goals and objectives, or even restating the initial problem (Fig. 1). It may also be the most
1118 important part of the process. As Fischman and Ruhl (2015: 5) observe, “failure to
1119 specify actions triggered by thresholds can lead to dead ends in what should be the

1120 continuing adaptive iteration cycle”.¹⁴ This may be especially problematic in a complex
1121 system such as the Delta, where outcomes often do not match expectations. When this
1122 happens it may indicate that the system was not understood (and modeled) as well as
1123 initially thought. Adapting may involve more than a slight change in management
1124 practices.

1125

1126 These two aspects of the “adapt” phase of adaptive management—who makes the
1127 decisions about whether to continue or to change management actions, and how much
1128 departure from expected outcomes should trigger a change in practices—often do not
1129 receive sufficient attention. The first is usually determined by who’s in charge, which is
1130 usually tied to the administrative or organizational structure for conducting a project. The
1131 second depends on whether the mismatch between desired and realized outcomes has
1132 exceeded a threshold of acceptability, which is determined by such things as the cost and
1133 feasibility of making a change, the suitability of alternatives, the priorities of stakeholders
1134 and interest groups, and a multitude of other factors. Both the decision-making and the
1135 determination of trigger points are situation-specific. Nonetheless, it is important to know
1136 something about both issues as one goes through the steps in the adaptive-management
1137 cycle, because this will affect how plans are formulated, what data are gathered, and how
1138 the findings are translated into useful information. Misidentifying who makes decisions
1139 or being either premature or tardy in responding to triggers can easily derail the adaptive-
1140 management process. This is why some have suggested that the adaptive-management
1141 cycle should actually begin at the point where the decision-making and authority lie.
1142 Unless there is some focus on the decision-making process and authority, the entire
1143 process may stall when the time comes to adapt management practices or adjust goals and
1144 objectives. An open and transparent decision-making process can help avoid this
1145 outcome.

1146

1147 Overall, it is our impression that decisions about whether to continue or change
1148 management approaches and actions are often based on some level of monitoring and
1149 analysis, combined with experience and professional judgment, current management
1150 needs, and the political (and funding) climate. The process varies tremendously among
1151 and within agencies, however, and it is often informal rather than systematic.

1152 Unfortunately, there is a tendency to regard any process that might result in change as
1153 adaptive management, which may be why so many think they are doing it.

1154

¹⁴ Fischman and Ruhl use the example of how the Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS) employed adaptive management in their proposals to comply with court mandates for management of listed fish in the Delta. NMFS included specific criteria to trigger revision of water operations to avoid jeopardy, whereas the FWS approach failed to provide precise, enforceable criteria. The NMFS approach was upheld, whereas the FWS plan was remanded.

1155 **VI. Why is Adaptive Management Not More Common in the**
 1156 **Delta?: Constraints and Impediments**
 1157

1158 In Section II we listed some factors that generally impede applications of adaptive
 1159 management. Several of these apply especially to management in the Delta and were
 1160 mentioned frequently by questionnaire respondents and interviewees. To make adaptive
 1161 management common for the Delta, these impediments must be effectively addressed.
 1162

1163 **Aversion to taking risks**
 1164

1165 Adaptive management maneuvers through uncertainty and unknowns by
 1166 progressively crafting a better understanding and quantification of the problem. These
 1167 uncertainties entail risk, with a probability of failing to achieve goals and objectives.
 1168 Failure is an anathema to the results-driven and political context of any management
 1169 agency. A manager or decision-maker must manage the risks of investing in projects with
 1170 uncertain results, even when the stakes are high. Explaining such risks to administrators,
 1171 politicians, or the public may be difficult. Perhaps these constraints and anxieties
 1172 encourage managers to believe that it is better to err on the side of caution and be
 1173 conservative in modifying original actions.
 1174

1175 While this characterization does not describe the approach of all programs,
 1176 managers, and agencies working in the Delta, it may not be too far off the mark for some.
 1177 As one respondent observed, "*Agencies and agency staff are risk averse. They would*
 1178 *rather not act, if there is a possibility that they may make the wrong decision, and having*
 1179 *it attributed to them.*" To implement adaptive management, however, managers must not
 1180 be penalized for trying approaches that later turn out to be ineffective or even to fail.
 1181

1182 The tendency of managers, decision-makers, policy specialists, and engineers to
 1183 be risk-averse or to strive to maximize certainty in their decisions contrasts with the
 1184 culture of science, in which uncertainty and risk are the *sine qua non*. To a scientist,
 1185 doing an experiment or conducting a study in which the results were certain and there
 1186 were no risks of surprises would be unexciting and pointless. This difference in
 1187 perspectives may contribute to some of the communication difficulties between scientists
 1188 and managers.
 1189

1190 **The curse of the immediate**
 1191

1192 The combination of an aversion to risk and the frequent need to make immediate
 1193 decisions creates a conundrum that can compromise the use of adaptive management in

1194 the Delta. Conducting comprehensive adaptive management will often be ponderously
1195 slow. Once the problem, goals, and objectives have been defined (which itself can be
1196 slow and contentious if multiple parties and interests are involved), doing the planning,
1197 modeling, designing, and permitting can easily take years before all is set to implement
1198 an action. Litigation can add more delays, and risk-avoidance by managers or decision-
1199 makers can further delay action. The system being managed may itself also respond
1200 slowly to management actions So it is little wonder that carrying the adaptive-
1201 management process to full term is rare.

1202
1203 Even if steps can be taken to reduce some delays, the orderly, sequential process
1204 of adaptive management is susceptible to being repeatedly sidetracked in the
1205 environmental, political, social, and fiscal setting of the Delta. Crises arise often,
1206 derailing long-range planning or continued monitoring. Staff assigned to data analysis,
1207 modeling, or monitoring may be shifted to address more immediate concerns, so
1208 knowledge to inform adaptive management may be obtained in fits and starts. As one
1209 respondent put it, “*the need to make decisions outpaces information flow.*” Put simply,
1210 the pace of adaptive management does not match the pace of events and management
1211 decisions in the Delta. Faced with this temporal mismatch, it may often be tempting to
1212 move ahead with an action while assuring that adaptive management will be implemented
1213 later if it turns out to be needed. While some actions may need to be taken quickly (such
1214 as constructing a salinity barrier under extreme drought conditions), this need not
1215 preclude the careful thought and planning that underlie the first phases of adaptive
1216 management (see Section VII).

1217

1218 **Regulations impede flexibility**

1219

1220 Management of a system as complex as the Delta, with multiple local, state, and
1221 federal agencies involved in decisions about water and the environment, is suffused with
1222 an array of regulations and permit requirements. These regulations and requirements
1223 reflect a desire and need to establish order, certainty, and stability; they set standards and
1224 limits, and prescribe the legal and operational domain within which management must
1225 operate. In contrast, the targets of management—smelt or salmon, water quality,
1226 incoming flows, demands on water exports, salinity intrusion, and the like—are anything
1227 but orderly, certain, and stable. The targets are assumed to be stationary, but in fact they
1228 are constantly moving. The flexibility needed to deal with changing conditions or to
1229 implement the “adaptive” part of adaptive management may be precluded by regulations.
1230 Listing of species under the Endangered Species Act, for example, places restrictions on
1231 experiments or pilot studies that might improve management and leads to a focus on
1232 single species rather than the larger ecosystem.

1233

1234 Obtaining permits for projects can be an arduous process that delays even well-
1235 planned projects. For example, one of the most ambitious habitat-restoration projects in
1236 the Delta, the Dutch Slough Tidal Marsh Restoration Project,¹⁵ must obtain permits from
1237 multiple state and federal agencies to initiate restoration activities. This process has taken
1238 years and remains incomplete. Even emergency actions face permitting delays. The
1239 proposal to construct an emergency drought barrier on the West False River to prevent
1240 tidal intrusion and a loss of water quality during the drought in 2015¹⁶ likewise required
1241 multiple permits from multiple agencies. Construction went ahead after Governor Jerry
1242 Brown issued an Executive Order exempting the project from requirements of the
1243 California Environmental Quality Act (CEQA) and other state requirements and an
1244 emergency authorization was granted by the Division Commander of the Corps of
1245 Engineers.

1246
1247 Once permits have been issued for management actions, it may become difficult
1248 to change directions in mid-project, even if new knowledge indicates that change is
1249 needed. The need to modify permits or obtain new ones may bring a project to a halt,
1250 particularly if litigation is involved.
1251

1252 **Monitoring is difficult to maintain**

1253
1254 Science is the lynchpin of adaptive management and should be the foundation of
1255 monitoring. Without monitoring the right things, at the right times, and at the right places,
1256 there is little way to know whether management actions are on track and whether they are
1257 moving toward the desired goal or toward an alternative outcome. As Lindenmayer and
1258 Franklin (2002) noted, “it is impossible to systematically assess whether management
1259 goals are being achieved without adequate monitoring, which in turn, ensures that the
1260 effectiveness of policies, legal obligations, and social commitments... can be assessed.”
1261 In short, without proper monitoring there is no way to manage adaptively. Monitoring is
1262 the “nerve center” of adaptive management (Fischman and Ruhl 2015).

1263
1264 Monitoring needs to occur before and during a project, not delayed until after the
1265 project is completed or when it is too late to make changes. Because the outcomes of
1266 actions are frequently not immediately apparent, however, monitoring also may need to
1267 be continued for some time after project completion to gauge the effectiveness of
1268 management actions. All of this emphasizes the importance of a continuing, long-term
1269 commitment to monitoring if adaptive management is to deliver on its potential.
1270

¹⁵ <http://water.ca.gov/floodsafe/fessro/environmental/dee/dutchslough/index.cfm>

¹⁶ <http://www.water.ca.gov/waterconditions/emergencybarriers.cfm>

1271 However, developing the needed long-term vision and commitment in the crisis-
1272 driven setting of the Delta is challenging. As one respondent noted, “*Unless there are*
1273 *legal or regulatory mandates to do monitoring, it is often the first thing to go when*
1274 *money gets tight.*” Others suggested “*monitoring is typically [of] discrete elements for a*
1275 *short duration to meet regulatory requirements*” and “*not designed to answer science*
1276 *questions.*” More generally, “*Adaptive management science efforts are not funded. They*
1277 *get added to a project and other resources and staff are depleted to meet the new*
1278 *requirements.*”

1279
1280 There is also a perception that the level of monitoring required by adaptive
1281 management is excessive and may not add value commensurate with its costs. Such
1282 monitoring “*takes away from other resource management obligations and needs.*” For
1283 example, “*Monitoring for a 300-acre restoration project far exceeds the costs of doing*
1284 *the restoration, so one can’t blend implementation with monitoring or the project*
1285 *becomes too expensive.*” This may be particularly true if the monitoring must generate
1286 sufficient statistical power to detect responses to management actions in the complex and
1287 variable environment of the Delta. The success of the Interagency Ecological Program in
1288 catalyzing continuing, long-term monitoring of aquatic resources in the Delta and in
1289 developing standardized monitoring protocols to evaluate the effects of tidal wetland
1290 restoration shows that it can be done, but it requires dedicated and stable funding.

1291

1292 **Incentives are lacking**

1293

1294 In the business world, profits provide a compelling incentive for using adaptive
1295 management. Incentives are less obvious for applying adaptive management to
1296 environmental or natural-resource institutions. Consequently, some may wonder why
1297 bother—what is to be gained by undertaking an arduous and expensive process? There is
1298 a “stick” for doing adaptive management—the requirements of the Delta Reform Act and
1299 the Delta Plan—but what is the “carrot”? Using adaptive management should increase
1300 cost-effectiveness in the long run, identify and reduce uncertainties, or identify and adjust
1301 for mistakes more promptly. These benefits may all be true, but because adaptive
1302 management has so rarely been fully implemented there is little supporting evidence. If
1303 managers and program leaders are to embrace adaptive management (as we believe they
1304 should), there needs to be something more than comforting assertions to answer, “What’s
1305 in it for me?” This question would be easier to answer if there were more examples of
1306 successful adaptive management in the Delta (and elsewhere) and if costs and benefits
1307 were clearly detailed.

1308

1309 **Adequate long-term funding is unreliable**

1310

1311 Without exception, the individuals and agencies we canvassed identified the lack
 1312 of reliable, long-term funding as the greatest single impediment to adaptive management
 1313 and monitoring in the Delta. Thus, *“little to no money is available or designated for*
 1314 *developing and implementing monitoring to determine outcomes.”* Or, *“... funding occurs*
 1315 *for those programs mandated by law”*; otherwise, *“details of adaptive management and*
 1316 *monitoring are often worked out as the project proceeds and the funding becomes*
 1317 *available.”* Or, *“There is insufficient funding to conduct the science and collaboration*
 1318 *necessary for evaluating actions and developing a response.”* Or, *“Funding for*
 1319 *monitoring of habitat enhancement after construction is not typically a priority or*
 1320 *directive of fund sources.”*

1321

1322 The difficulty of funding adaptive management indicates that it is often not as
 1323 high a priority as it should be. Even if funding is available to support the adaptive
 1324 management that programs or agencies want to do, however, the funds often come in
 1325 ebbs and flows that render the funding inefficient or ineffective. *“Support comes in pulses*
 1326 *that put a premium on showing progress, rather than deliberate, long-term projects.”*
 1327 Bond funding, such as that from the recent Proposition 1, may provide money to do
 1328 things, but not to follow up and determine the outcomes. General Fund allocations for
 1329 adaptive management and monitoring are difficult to obtain. And there is a perception
 1330 among some that these activities are thinly disguised ways to fund scientific research that
 1331 does not address real problems.

1332

1333 Adaptive management is often viewed as an unfunded mandate. We believe that
 1334 people and programs generally want to, and try to, practice adaptive management, but
 1335 without dedicated and reliable funding they are reluctant to do so at the expense of
 1336 existing projects and programs. But adaptive management cannot be done effectively in
 1337 fits and starts or as an add-on when resources are available. If adaptive management is to
 1338 be done, it must be built on a mechanism to follow through. It requires an underlying
 1339 commitment to long-term stewardship of the Delta and its resources. It should be a high
 1340 priority, the default practice (“Plan A”) for most projects and management actions.

1341

1342 **VII. Standing Back and Looking Forward: Broadening the**
 1343 **Perspective on Adaptive Management**

1344

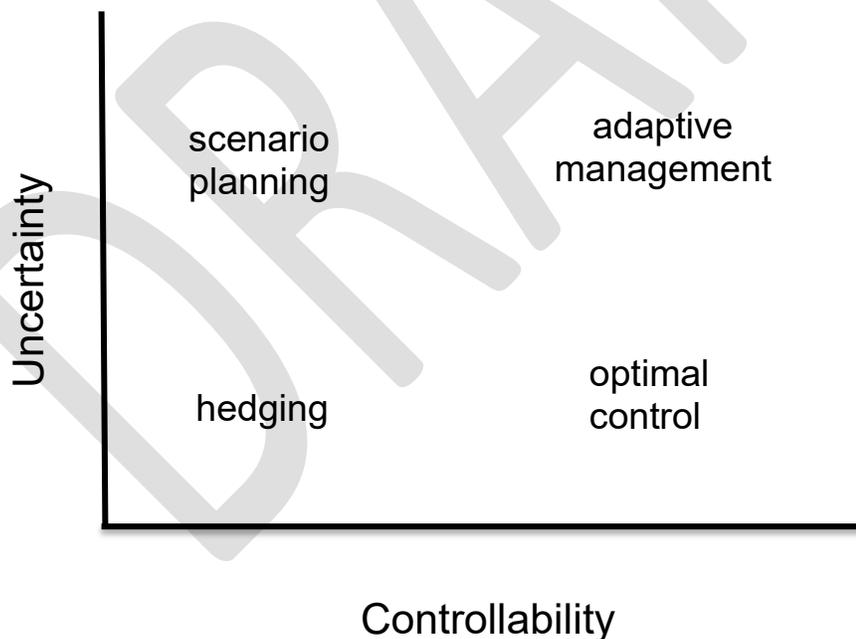
1345 So far, we have focused on the details of the adaptive-management process and
 1346 how it is used and perceived by those working in the Delta, relying heavily on their own
 1347 words. Now we take a broader view, offering some thoughts prompted by those
 1348 comments and responses. We hope that these thoughts will provide some guidance for

1349 making adaptive management more user-friendly, and thus more widely used in dealing
 1350 with resource issues in the Delta.
 1351

1352 **Adaptive management may not always be appropriate**

1353

1354 Adaptive management should be the default approach to management actions in
 1355 the Delta. It is also mandated by the Delta Reform Act and the Delta Plan. But adaptive
 1356 management is not an inflexible, one-size-fits-all process appropriate for every situation;
 1357 it couldn't be, given the variety of resource-management problems it is intended to
 1358 address (Gregory et al. 2012). Adaptive management should not be forced upon a project
 1359 that is unsuited for it, either because the actions do not warrant it or the institutional or
 1360 stakeholder support is lacking. In the *Department of Interior Applications Guide for*
 1361 *Adaptive Management*, Williams and Brown (2012) suggest that adaptive management is
 1362 appropriate to situations in which both uncertainty and controllability are high and when
 1363 the approach may reduce uncertainty by controlling (i.e., adapting) the actions that are
 1364 taken (Fig. 2). Key determinants of adaptive management are its appropriateness,
 1365 feasibility, and likelihood of success; a decision tree can help evaluate whether and when
 1366 a situation might meet these criteria (Rist et al. 2013),
 1367



1368

1369 Figure 2. Approaches to making natural-resource decisions. The appropriate approach depends on
 1370 the influence decisions can have on system behavior and the uncertainty of management impacts
 1371 (after Williams et al. 2007).¹⁷

1372

¹⁷ <http://www.usgs.gov/sdc/doc/DOI-%20Adaptive%20ManagementTechGuide.pdf>

1373 Funding is usually the most important factor influencing the decision to use
1374 adaptive management. It may make little sense to initiate an elaborate and expensive
1375 adaptive-management process if the money is not available to do it properly. However,
1376 for high-priority management actions in which the stakes, costs, and economic impacts
1377 are high, rigorous adaptive management may be essential. Here the value in investing in
1378 upfront knowledge acquisition may justify the expense, especially if an action, once
1379 started, cannot easily be changed. Such situations call for comprehensive adaptive
1380 management, and the nine-step process shown in Figure 1 provides clear guidance.

1381
1382 In many situations, however, the nine-step process might better be seen as
1383 aspirational rather than prescriptive. Can the adaptive-management process be
1384 streamlined to require fewer resources and move more quickly, and in doing so have less
1385 potential to disrupt a program? Steps 1 (defining the problem), 2 (establishing goals), 4
1386 (selecting action(s)), and 5 (designing and implementing actions) are the core
1387 components of any management activity, whether adaptive or not. It is important that
1388 they be done thoughtfully, based on knowledge and experience, with an eye toward
1389 flexibility. Step 3 (modeling) is often considered a barrier, but this depends on the kind
1390 and level of modeling required. It should not take much time or effort to assemble enough
1391 of what is known about a system to develop a reasonable conceptual model, which can
1392 quickly reveal unrecognized linkages and critical knowledge gaps and can suggest
1393 alternative actions. The impediments to such modeling are more institutional than
1394 intrinsic to the modeling process.

1395
1396 Likewise, step 6 (monitoring) needn't involve assessing all components of a
1397 system with rigorous and demanding procedures. A good conceptual model may help to
1398 identify reliable indicators of system responses to management actions, and planning
1399 ahead to think about the circumstances that might lead to a change in management could
1400 help to determine where, when, and with what level of detail the targets should be
1401 monitored. Finally, steps 7 through 9 (analyze, communicate, and adapt) can be adjusted
1402 to the complexity and quantitative level of the information gathered and what changes, if
1403 any, are suggested and may need to be justified. The "synthesize and evaluate" part of
1404 step 7, especially, requires careful, focused thought and discussion among project
1405 participants (including stakeholders).

1406
1407 Streamlining the adaptive-management process is not acceptable to some.
1408 Fischman and Ruhl (2015) disparage what they call "AM-lite," in which clear objectives
1409 are lacking, the iterative process is not followed, monitoring is inconsistent, and defined
1410 trigger points for actions are missing. Although such approaches have been presented as
1411 adaptive management, courts have recognized that they are not (Fischman and Ruhl
1412 2015). We suggest that a more judicious lightening of the process may sometimes be

1413 appropriate, while remaining true to the spirit and intent of rigorous adaptive
1414 management.

1415

1416 Some have countered suggestions that adaptive management be simplified and
1417 made more user-friendly in appropriate situations by proposing that the process be made
1418 even more rigorous and demanding. Convertino et al. (2013), for example, advocate
1419 “enhanced adaptive management,” in which the structured process we have described is
1420 integrated with decision analysis, scenario analysis, and environmental modeling. The
1421 approach explicitly evaluates alternative strategies, calculated the cost-benefit payoffs
1422 associated with each, and quantified stakeholder preferences in determining priorities
1423 among the strategies. Others (e.g., Gregory et al. 2012) argue that adaptive management
1424 is a weaker subset of formalized structured decision making, which is a more complex,
1425 scientifically robust, and demanding approach. It would be productive to explore these
1426 more formal analysis alternatives for some major management issues in the Delta.

1427

1428 The bottom line is that there are ways to manage adaptively, whether or not one
1429 does comprehensive adaptive management following the steps of Figure 1. The key is to
1430 understand the value and advantages of the process and to look ahead rather than reacting
1431 too quickly, avoiding all risk, or clinging to an existing approach that isn’t working.
1432 Conducting adaptive management requires patience, persistence, and commitment
1433 (Williams and Johnson 1995), but it also benefits from thoughtful assessment of how
1434 much of the process is just right for the circumstances and objectives. A step in the
1435 structured approach to adaptive management (e.g., Fig. 1) should not be omitted simply
1436 because it is difficult or expensive, but neither should it be carried out with a level of
1437 detail and rigor (and difficulty and expense) that is not warranted by the effects the
1438 results will have on decision making.

1439

1440 **Conditions change**

1441

1442 Looking ahead is important not just so one can gauge the effectiveness of an
1443 action and make changes before it is too late, but also because the Delta, like the rest of
1444 California and most of the world, is undergoing massive change. All coastal areas will be
1445 affected by sea-level rise, and models of future climate change predict higher
1446 temperatures and altered rainfall and snowfall patterns, with changed hydrologic flows in
1447 the Delta. New non-native species will continue to arrive. Regulatory requirements and
1448 the economic values of land and water will continue to change. Consequently, even the
1449 most thoughtfully planned and carefully designed management actions may no longer be
1450 appropriate by the time they are completed, or even by the time they are implemented
1451 given protracted planning and permitting. If the system changes rapidly and
1452 unpredictably, an action may not produce the desired outcomes or it may be difficult to

1453 determine whether a change in the system is due to the action itself or to changes in other
1454 factors. Although some people question whether the rapidity of these environmental
1455 changes precludes the effective use of adaptive management, others suggest that adaptive
1456 management is the best approach to deal with rapid changes because of its management
1457 flexibility, which is an essential element of decision-making in a changing world.

1458

1459 Adaptive management also provides a way to formally anticipate and prepare for
1460 changes through modeling and monitoring. Some plans for tidal wetland restoration, for
1461 example, are incorporating projections of sea-level rise, hydrology, and sedimentation to
1462 target actions at appropriate tidal elevations for future conditions (see Box 1). It may be
1463 useful to develop “anticipatory adaptive management,” in which the management actions
1464 are designed for future conditions, when the actions will be completed and the outcomes
1465 are expected, rather than for the conditions existing at the time the actions are planned or
1466 initially implemented. Vleig and Zandvoort (2013) describe such an approach to adaptive
1467 management in the Rhine-Meuse Delta of the Netherlands and compare it with the
1468 approach outlined for the Sacramento-San Joaquin Delta in the Delta Plan.

1469

1470 Another consequence of environmental change impinges on how or whether
1471 adaptive management is implemented. If change is great enough or rapid enough, it may
1472 overwhelm any inherent resilience of a system and push it over a threshold or tipping
1473 point. Once a threshold is passed, the system may be so altered that it functions
1474 differently, rendering it difficult or impossible to return to a former condition even with
1475 intense management (Moyle and Bennett 2008). In such cases, the dynamics of the
1476 system may have been fundamentally altered, changing cause-effect relationships.
1477 Consequently, the previous understanding of the system, on which management relies,
1478 may no longer apply—the rules of the game have changed. The problem with thresholds,
1479 of course, is that you generally don’t know they are there until you’ve passed them, when
1480 it may be too late to do much about it. In a complex ecosystem that has undergone
1481 massive alteration, such as the Delta, some thresholds have already have been passed; the
1482 Pelagic Organism Decline may be such a situation. We found little evidence that much
1483 thought has been given to the complications posed by such thresholds. Clearly, however,
1484 the likelihood of thresholds heightens the need to incorporate flexibility and adaptability
1485 into planning and management.

1486

1487 The bottom line is that future changes should always be considered in planning
1488 management actions, even though (as Yogi Berra also said), “It’s tough to make
1489 predictions, especially about the future.” Nonetheless, future changes will determine the
1490 effectiveness of management whether or not the approach is adaptive, whether or not
1491 there are legal or regulatory requirements to consider the future, and whether or not the
1492 approach is explicitly anticipatory.

1493

1494 **“Best available science” may not always be essential**

1495

1496 The use of “best available science” is a common requirement for management
 1497 actions in an uncertain environment. It is explicitly mandated in the Delta Reform Act
 1498 and is discussed at some length in the Delta Plan. Best available science “requires
 1499 scientists to use the best information and data to assist management and policy decisions”
 1500 (Delta Plan, page C-1). In essence, it is the gold standard for applied science.

1501

1502 We do not question the importance of using current and well-tested scientific
 1503 knowledge to support management or the desirability of aspiring to the criteria
 1504 established for best available science (Delta Plan, Table C-1). Indeed, management
 1505 actions in the Delta should always have a strong foundation of scientific knowledge.
 1506 However, it may be worthwhile to reflect on whether best available science is always the
 1507 most appropriate or productive goal for implementing science-based management in the
 1508 Delta. We have several comments.

1509

1510 First, what we believe is really intended is to bring the best available *knowledge*
 1511 to bear on an issue or used to support a proposed action. Science often provides the most
 1512 credible and reliable information, but it is not the only source of knowledge about the
 1513 Delta. The learning that is the aim of adaptive management involves increasing the
 1514 quality and quantity of knowledge on a particular issue, not just adding more science to
 1515 the mix. Admittedly, “best available knowledge” doesn’t have the same cachet as “best
 1516 available science,” but it may more accurately capture what is really being sought.

1517

1518 Second, the emphasis on “best” and the criteria used to define it appropriately sets
 1519 a high bar. It may be set so high, in fact, that actions may sometimes be delayed while the
 1520 search goes on for better data, better analyses, or additional scientific publications, all in
 1521 the interests of meeting the goal of “best.” There are already excuses available for
 1522 delaying actions (especially controversial ones); aiming for “best” should not be one of
 1523 them. On the other hand, some suggest that what is really meant is best *readily available*
 1524 science. Framing it this way can help to avoid such delays, but what is “readily available”
 1525 depends on how hard one looks. In some cases, depending on readily available science
 1526 may promote taking actions with knowledge that is woefully incomplete. Conceptual
 1527 models may help to reveal dangerous inadequacies in the knowledge base.

1528

1529 Third, adaptive management involves a succession of steps that build on what is
 1530 sufficient to take action—further reduction in uncertainty often is not needed to move
 1531 ahead. In fact, it is often necessary to initiate a management action when the available
 1532 knowledge is just “good enough,” rather than being the “best available” (or even “best

1533 readily available”). The same criteria used to identify “best available” science might also
1534 be used, in a somewhat more relaxed form, to define what is “good enough” science.
1535 Essentially, thinking of the science as “good enough” allows a manager or decision-
1536 maker flexibility in considering the additional costs, risks, uncertainties, effort, and
1537 potential benefits of attaining “best available.” However, using a “good enough” standard
1538 should *not* be an excuse for weakening the role of science in informing management and
1539 policy. Any standard, whether it be “best available,” “best readily available,” or “good
1540 enough,” must be scientifically defensible and rigorous and, more importantly, can be
1541 implemented in a complex physical, biological, social, and regulatory environment.
1542 Formal risk analysis can help to resolve such issues.

1543

1544 All of this may be quibbling about words. Words matter, however. “Best available
1545 science” implies (correctly or not) that scientific certainty is as good as currently
1546 possible. Science that is just “good enough” doesn’t sound nearly so rigorous, but it may
1547 be appropriate when combined with sound adaptive management.

1548

1549 **VIII. Overall Findings**

1550

1551 Most practitioners and managers in the Delta have a general understanding of
1552 what adaptive management is and what it entails. However, the term is perceived in
1553 different ways and is often regarded as any process that might lead to changes in actions.
1554 We find little evidence that the actual process is being fully implemented. Instead,
1555 adaptive management, the organized research needed to fill knowledge gaps and reduce
1556 uncertainty, and the essential monitoring needed to successfully implement it are often
1557 regarded as add-ons or obligations that divert attention from needed projects.

1558

1559 Despite the successful application of adaptive management in a variety of fields,
1560 ranging from engineering to medicine, there are several reasons for the struggle to
1561 implement it fully in the Delta. It is easy to blame a lack of funding and human resources,
1562 and certainly funding to undertake adaptive management (including the monitoring) is
1563 sporadic and inadequate and expertise is in high demand and difficult to attract and
1564 retain. But increased funding or staffing, by themselves, would not ensure that adaptive
1565 management would be fully implemented. To do so will require a change in the culture of
1566 management in the Delta. Managers and decision-makers must become more willing to
1567 take risks. *Not* managing adaptively entails the risk that, by following a traditional
1568 approach, better options are ignored. Risks of action (or inaction) should be weighed
1569 against benefits by using conceptual or quantitative modeling or informed judgment.
1570 Agencies must become more actively engaged in collaborations with one another and be
1571 willing to share staff and resources as the challenges require. Adaptive management must
1572 be recognized as a high priority, as dictated by the Delta Reform Act and the Delta Plan.

1573 It must become an integral part of management plans and actions. As Luoma et al. (2015:
 1574 17) recently observed, effective adaptive management requires “collaboration,
 1575 communication, and transparency among all interest groups as well as a willingness to
 1576 overcome the institutional barriers to collaborative decision-making.” The cost savings
 1577 from sharing staff skilled in data management, analysis, and modeling may be
 1578 particularly great. Perhaps most importantly, adaptive management requires greater
 1579 flexibility—flexibility in decision-making, in regulations and permitting, and in planning
 1580 for future changes.

1581
 1582 These changes will not be easy or achieved quickly. However, the following
 1583 suggestions and recommendations will help move adaptive management toward a more
 1584 effective and integrated approach to managing the Delta, its water, and its ecosystems.
 1585

1586 **IX. A Way Forward: Improving Adaptive Management in the** 1587 **Delta**

1588
 1589 Science, management, and policy in the Delta are in a state of flux, brought on by
 1590 the proposal to build new water-conveyance facilities; the heightened imperilment of
 1591 several species at risk of extinction; the continuing entry of new, non-native species into
 1592 the Delta; imminent changes in hydrology and sea-level rise due to climate change; the
 1593 specter of increased salinity intrusion into the Delta; the vulnerability of aging levees;
 1594 and increasing conflicts over who gets available water—all of which are exacerbated by
 1595 the ongoing drought. This cauldron of change provides an unusual window of
 1596 opportunity—and an imperative—to develop a more thoughtful and effective approach to
 1597 achieving the goals highlighted in the 2009 Delta Reform Act for the future of the Delta.
 1598 The Delta Plan and Delta Science Plan provide frameworks for capitalizing on this
 1599 opportunity, and the theme of “One Delta, One Science” offers a way to bring coherence
 1600 to the science currently fragmented among agencies and disciplines. This fragmentation
 1601 thwarts effective adaptive management (Lund and Moyle 2013). A more holistic and
 1602 integrated approach to science-based adaptive management in the Delta is needed to face
 1603 both current and future challenges.

1604
 1605 Despite legislated mandates to use adaptive management, this will not happen
 1606 spontaneously. To become fully integrated into Delta management, adaptive management
 1607 will require *collaboration* among agencies, managers, scientists, engineers, and
 1608 stakeholders, and *commitments* by those who control resources and make decisions.
 1609

1610 Advancing “collaboration” and “commitments” from aspirations to become the
 1611 foundation for a widely used process of adaptive management in the Delta will require
 1612 leadership from an organized body, an “adaptive management team.” Such an adaptive

1613 management team should be dedicated to promoting and coordinating adaptive
1614 management in the Delta and providing guidance and support in its applications. Among
1615 its functions, such a team could:

1616

- 1617 1. Provide leadership in aligning adaptive management with the needs and context
1618 of management actions;
- 1619 2. Consider how anticipated changes in future conditions can be incorporated into
1620 adaptive-management plans and actions;
- 1621 3. Identify potential synergies among agencies, support adaptive governance, and
1622 foster management flexibility;
- 1623 4. Advise the Delta Stewardship Council and regulatory agencies on compliance
1624 issues and the appropriateness of adaptive management for proposed actions;
- 1625 5. Encourage a greater emphasis on whole ecosystems and functioning landscapes;
1626 and
- 1627 6. Assemble, synthesize, and communicate information about adaptive management.

1628

1629 Creating a body to coordinate adaptive-management activities is not a new idea.
1630 Similar suggestions have been made before. In the context of the CALFED program,
1631 for example, Zedler and Callaway (2003) proposed developing an adaptive
1632 management team that “meets annually, identifies priority research needs,
1633 prioritizes sites where adaptive restoration might take place, reviews research
1634 results, and recommends future actions.” Lund and Moyle (2013) suggested that
1635 adaptive management in the Delta should be overseen by a “Delta Director” and a
1636 small interagency committee, with parallel structures for geographic subregions of
1637 the Delta. The Delta Science Plan developed by the Delta Science Program in 2013
1638 recommended the creation of several “adaptive management liaison” positions to
1639 provide advice to their counterparts engaged in adaptive management in agencies
1640 and organizations; and convening an annual “adaptive-management forum” to share
1641 lessons learned and provide training in adaptive management. These efforts are
1642 now underway. In addition, the Collaborative Science and Adaptive Management
1643 Program (CSAMP, composed of agency directors, regional directors, and general
1644 managers) and the Collaborative Adaptive Management Team (CAMT, which
1645 includes senior scientists and high-level managers) focus on the effects of the State
1646 Water Project (SWP) and Central Valley Project (CVP) on listed species, particularly
1647 smelt and salmon. However, neither of these groups considers the broader issues of
1648 management of the species themselves, the ecosystems they occupy, or the Delta as
1649 a whole. The recirculated draft RDEIR/SDEIS for California WaterFix proposes
1650 formation of a Collaborative Science and Adaptive Management Program that would
1651 build on CSAMP and CAMT and focus primarily on the design and operation of

1652 water-conveyance facilities, associated water-quality and ecosystem-protection
1653 requirements, and mitigation measures such as habitat restoration.

1654

1655 All of these efforts are designed to move adaptive management more into the
1656 mainstream of Delta activities, all are based on some version of a structured approach to
1657 adaptive management such as we have described, and all are in their early stages. They
1658 provide encouraging foundations on which to build a more comprehensive and
1659 coordinated approach to adaptive management in the Delta. To do this, however, several
1660 concerns and issues that were raised by interviewees and reviewers of our draft report
1661 must be addressed:

1662

- 1663 1. Can a coordinating body for adaptive management be effective without legal or
1664 financial authority? To confer authority, it may be appropriate for the resource
1665 agencies to lead in establishing governance and funding structures for adaptive
1666 management.
- 1667 2. Can such a body be effective if it is not independent of the agencies charged with
1668 implementing (and funding) adaptive management? Adaptive management might
1669 best be coordinated through the Delta Stewardship Council, the Delta Science
1670 Program, or some body not directly involved in management activities.
- 1671 3. Can management and policy agencies cede leadership of adaptive management to
1672 a coordinating body? Strong, independent leadership will be required to foster the
1673 mutual trust and respect needed to enable multiple parties to design and conduct
1674 coordinated adaptive management and navigate the tangled web of Delta interests.
- 1675 4. Would it be better to promote adaptive management through a single body that
1676 considers overall management of the Delta, through more targeted teams focused
1677 on specific topics (e.g., habitat restoration, water flows) or geographical areas, or
1678 by some combination of the two? A single body well versed in the application of
1679 adaptive management could develop a broad perspective on management
1680 challenges in the Delta through the variety of projects that they deal with,
1681 although they would need to rely on specific expertise to evaluate individual
1682 projects. A targeted team approach has reverse advantages and disadvantages.
- 1683 5. How should a body coordinating adaptive management be composed? Should it
1684 include agency representatives, practitioners with direct experience in managing
1685 resources, regulators, external scientists, and/or stakeholders? What sort of
1686 expertise and experience would best provide the envisioned functions? Should
1687 team members be full-time or part-time on assignment from their normal job?
- 1688 6. How can such a body act as a facilitator of adaptive management, rather than
1689 being viewed as yet one more bureaucratic layer that is a hurdle to be avoided?
1690 Overcoming preconceptions about the role and responsibilities of such a body will
1691 be a major challenge

1692
 1693 None of these concerns presents an insurmountable barrier to formation of a
 1694 comprehensive approach to organizing adaptive management in the Delta. We believe
 1695 that adaptive management is most likely to take hold and become commonplace in the
 1696 Delta if there is some coordinating body. The devil, however, is always in the details. The
 1697 above questions, and others, must be answered if such a body, however structured, is to
 1698 be successful.

1699

1700 **X. Recommendations**

1701

1702 Fundamental changes are needed in how adaptive management is organized and
 1703 managed in the Delta. This should begin with a unified understanding of adaptive
 1704 management: what it is and what it is not; what it requires in resources; what it needs in
 1705 organizational, operational, and regulatory flexibility; and when it is appropriate and
 1706 when it is not. Implementing the following recommendations will help to advance
 1707 adaptive management in the Delta.

1708

1709 1. **Convene a workshop to determine how to coordinate and assist adaptive**
 1710 **management in the Delta.** The Delta Stewardship Council should assemble an
 1711 appropriate mix of experts, agency leaders, resource managers, practitioners,
 1712 scientists, stakeholders, and regulators to consider the concepts developed in this
 1713 report; assess how best to resolve the above questions and concerns; recommend
 1714 what sort of coordinating and/or governing body will be best suited to advance
 1715 adaptive management in the Delta; evaluate how this body should relate to other
 1716 ongoing and developing adaptive-management programs; ensure buy-in by the
 1717 management, policy, and scientific communities; and consider how to implement
 1718 the other recommendations of this report. Among its responsibilities, this body
 1719 should also periodically assess how agencies are adopting and using adaptive
 1720 management. Through these reviews, lessons can be passed on to other agencies
 1721 and impediments discussed as problems arise.

1722

1723 2. **Support adaptive management with dependable and flexible funding .**
 1724 Adaptive management in the Delta will not become a reality unless the paucity
 1725 and unpredictability of funding to support the process are remedied. Radically
 1726 different and more effective approaches to funding adaptive management are
 1727 needed. Project budgets should include a line-item allocation at a fixed proportion
 1728 (10-20%) to support Delta adaptive management, above and beyond the funds
 1729 required for monitoring. These funds should *not* be transferred from other existing
 1730 activities into a bin labeled “Adaptive Management” (i.e., not “robbing Peter to
 1731 pay Paul”). Other avenues of dedicated funding for adaptive management should

- 1732 be explored as part of the deliberations of the group proposed in Recommendation
1733 1. Establishing an endowment to support adaptive management as well as the
1734 long-term needs of stewardship of Delta resources is one possibility.
1735
- 1736 3. **Design and support monitoring.** Designing monitoring protocols to fit the
1737 magnitude of management actions and the timing of important ecosystem
1738 processes will make the value of adaptive management more readily apparent. In
1739 addition, developing an institutionalized regional approach to monitoring may
1740 help to coordinate actions among projects and facilitate the collection, analysis,
1741 and synthesis of data that are compatible across projects. Monitoring programs
1742 should include an integrated data-management system. The development of
1743 comprehensive monitoring programs and protocols should draw from the
1744 experience of the Interagency Ecological Program, the Delta Regional Monitoring
1745 Program, and approaches developed elsewhere.
1746
- 1747 4. **Integrate science and regulations to enhance flexibility.** Rigid regulations and
1748 permitting requirements inhibit the flexibility required to change directions
1749 quickly when it becomes apparent that management outcomes are not as planned.
1750 Innovative ways to incorporate sufficient flexibility into regulations and permits
1751 to allow adaptive management should be developed with regulatory and
1752 permitting agencies. Approaches such as pre-authorization of adaptive actions,
1753 allowing variations around regulatory criteria, or focusing on performance
1754 objectives and flexible outcomes rather than set compliance targets may help.
1755
- 1756 5. **Develop a framework for setting decision points or thresholds that will**
1757 **trigger a management response.** The most vexing component of adaptive
1758 management is determining when conditions should trigger a re-evaluation or
1759 change in practices. In the absence of designated decision points, reluctance to
1760 change may delay adaptive responses, especially if the system is changing slowly.
1761 Such decision points should be part of adaptive-management plans from the
1762 outset.
1763
- 1764 6. **Use restoration sites to test adaptive-management and monitoring protocols.**
1765 Adaptive management should be part of the design of habitat-restoration projects
1766 envisioned in California EcoRestore, so that these projects can act as learning
1767 laboratories and develop practices that can be applied elsewhere in the Delta.
1768
- 1769 7. **Capitalize on unplanned experiments.** Unexpected events (e.g., extreme
1770 droughts, large floods, levee breaks) or necessarily quick management decisions
1771 (e.g., construction of salinity barriers, cold-water releases from dams) provide

1772 opportunities to learn and test adaptive management. Capitalizing on these
 1773 opportunities requires having contingency plans, monitoring protocols, and
 1774 modeling capability in place and identifying funds and staff that can be shifted to
 1775 respond. The RAPID grant program of the National Science Foundation may
 1776 provide a useful model.

1777

1778 **8. Recognize when and where adaptive management is not appropriate.**

1779 Adaptive management is not a panacea to be used in all situations. Sometimes,
 1780 adaptive management may be inappropriate or need to be greatly streamlined. In
 1781 other situations, sufficient support from federal, state, and local agencies may be
 1782 lacking. In these circumstances, attempts to implement adaptive management may
 1783 not be effective, and substantial changes in expectations and a refocusing of
 1784 adaptive management attention and even legislation may be needed. Decisions
 1785 about whether or how to use adaptive management should be made thoughtfully,
 1786 after careful consideration of the alternatives, with the guidance of an adaptive-
 1787 management coordinating body as proposed in Recommendation 1.

1788

1789 **XI. What Next?**

1790

1791 It will not be easy to implement these recommendations. In our view, however, it
 1792 is essential to do so if adaptive management is to become an integral part of management
 1793 of the Delta and its resources. Making this happen will require leadership in science and
 1794 policy, most immediately from the Delta Stewardship Council and Delta Science
 1795 Program, but including other programs and agencies. The key words, once again, are
 1796 *collaboration* and *commitments*.

1797

1798 The work of the Delta ISB in fostering wider and more nimble application of
 1799 adaptive management to Delta management should not end with this report. We envision
 1800 continuing Delta ISB involvement in several follow-up activities:

1801

- 1802 1. Work with the Delta Stewardship Council and others as they deliberate how best
 1803 to implement Recommendation 1.
- 1804 2. Meet with the individuals and programs who provided the material for our review
 1805 to discuss our findings, how to address the impediments, and how to progress
 1806 from words and plans to adaptive actions. These discussions will provide
 1807 additional input to the deliberations of Recommendation 1.
- 1808 3. Present and discuss these findings and recommendations to multiple audiences
 1809 (e.g., Bay-Delta Science Conference, a perspective paper in *San Francisco*
 1810 *Estuary and Watershed Science*).

- 1811 4. Assist the Delta Science Program, the Delta Conservancy, CAMT, the Public
 1812 Policy Institute of California, and others in organizing an Adaptive Management
 1813 Forum, including local and invited experts and multi-perspective panels, to focus
 1814 on the science that is needed to do adaptive management in a system as complex
 1815 as the Delta. Individuals involved in other large projects, such as the Everglades
 1816 or Glen Canyon Dam, will be included.
- 1817 5. Work with the Delta Science Program to track progress on the implementation of
 1818 adaptive management and the recommendations presented in this report.
- 1819 6. The most compelling way to counter perceptions that adaptive management is too
 1820 expensive or does not yield real benefits may be to document costs and benefits of
 1821 programs where the process has been applied. An economic analysis of the return-
 1822 on-investment of adaptive management, coordinated through the Delta Science
 1823 Program, should be considered.
 1824

1825 **XII. Afterword**

1826

1827 In *The State of Bay-Delta Science, 2008*, Kimmerer et al. (2008: 93) concluded,
 1828 “Although it is tempting to call yet again for adaptive management, previous such calls
 1829 have not been very successful. Instead, we recommend that scientific investigations and
 1830 ways of thinking be incorporated further into the management process.” We concur
 1831 enthusiastically with the plea to put more science into management in the Delta, but we
 1832 feel that it is too soon to give up on the prospect of making adaptive management a
 1833 widespread and successful enterprise in the Delta. The potential benefits of adaptive
 1834 management, if used judiciously and effectively, are great. We hope that the perspectives,
 1835 comments, and recommendations in this report will help to move adaptive management
 1836 in the Delta from talk to action.

1837

1838 We must temper this optimism, however, with a dose of realism. The Delta is
 1839 changing ever more rapidly. Climate change, sea-level rise, increased frequency and
 1840 severity of extreme events, new invasive species, economic globalization, social and
 1841 demographic shifts, and politics will create fundamental changes in the Delta and
 1842 increase uncertainty. Managing with more flexibility, a greater willingness to take risks,
 1843 more latitude in permitting and regulations, enhanced collaboration and communication,
 1844 and more nimble decision-making will help. But stewardship of the Delta and its way of
 1845 life will require more. Management recipes of the past (including structured approaches
 1846 to adaptive management) may no longer suffice. The novel ecosystems of the future will
 1847 require novel approaches—helping species move to new locations, accepting some non-
 1848 native species as part of the new nature, restoring landscapes rather than bits of habitat,
 1849 balancing the needs of people and the environment, and coming to grips with the
 1850 inevitability that some species will be lost.

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1859

The Delta can become a model of enlightened management. The conceptual and logical framework of adaptive management can help California prepare for this changed world. But fresh thinking and new approaches will be needed, founded on a new state of mind about people, resources, and the environment. Business as usual will only continue the current trend toward environmental bankruptcy.

DRAFT

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1861

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1988
1989

DRAFT

1990 **Appendix B. Adaptive Management in the Everglades.** From
 1991 Doremus et al. (2011).

The Everglades: Without Clear Goals, Adaptive Management Goes Nowhere

The Comprehensive Everglades Restoration Plan (CERP) illustrates one instance where adaptive management has failed primarily because it was mandated by Congress in an inappropriate context. The CERP was adopted in 2002 in an effort to restore the ecological functioning of the Florida Everglades.² Congress intended “to restore, preserve, and protect the South Florida ecosystem while providing for other water-related needs of the region, including water supply and flood protection.”³ The \$8 billion cost of the restoration plan was to be shared equally by the federal government, through the Army Corps of Engineers, and the non-federal sponsor, the South Florida Water Management District (SFWMD).

Heavy emphasis has been placed on satisfying stakeholders’ economic interests rather than the environmental mandates, and this imbalance places a chokehold on experimentation, learning, and adaptation. In response to stakeholders’ demands, the CERP devotes a great deal of attention to the use of ever more heroic engineering techniques to expand water supplies and ensure flood control for South Florida’s exploding population. Meanwhile, it gives low priority to the improvement of necessary sheet water flows—the primary ecological hallmark of the Everglades. As a result, the CERP remains in a planning mode, rather than an adaptive implementation mode. In a 2007 review, the Government Accountability Office observed that no CERP projects had been completed and that the only progress that had been made involved a few, select CERP-related pilot projects designed to understand nutrient removal in abandoned agricultural fields.⁴

Why has such a well-funded attempt at adaptive management faltered? One factor is the articulated goal of the CERP, which strives to have it all: ecosystem restoration as well as uninterrupted water supply and flood protection. As in other cases where private economic stakes are high, regulated entities and other stakeholders want certainty and stability. If scientists cannot predict outcomes with a great degree of certainty, experimentation in many instances, if not most, simply will not take place. As a result, the Everglades plan is stuck on modeling and data collection rather than learning through active experimentation and resolving uncertainties in favor of ecological resilience.

A second factor is the basic congressional directive for all Corps’ decision-making, which gives the agency discretion to proceed with a project whenever benefits “to whomsoever they accrue” exceed costs.⁵ These grants of broad discretion free the Corps to establish priorities based on politics instead of principled reasoning and evidence. As a result, the American public has been saddled with hundreds of questionable dams, levees, and other structures justified only by dubious cost-benefit analyses. In a study of Mississippi River management in 2004, the National Research Council issued a sweeping indictment of the misguided methodology used by the Corps to justify replacing locks and dams on the upper river.⁶ The CERP appears to suffer from similar flaws.

1992
 1993

1994 **Appendix C. The Adaptive-Management Questionnaire**

1995

1996

DELTA INDEPENDENT SCIENCE BOARD

1997

REVIEW OF ADAPTIVE MANAGEMENT IN THE DELTA

1999

2000 The Delta Reform Act of 2009 charges the Delta Independent Science Board (DISB) with
 2001 providing "oversight of the scientific research, monitoring, and assessment programs that
 2002 support adaptive management of the Delta through periodic reviews of each of those
 2003 programs "such that" all Delta scientific research, monitoring, and assessment programs
 2004 are reviewed at least once every four years" (§85280 (a)(3)). Rather than reviewing
 2005 individual programs one-by-one, we are conducting reviews based on broad thematic
 2006 areas. This questionnaire is the first stage of our review of how adaptive management is
 2007 being thought about, planned, and implemented in the Delta and how science can best
 2008 support those efforts.

2009 We intend that our review go beyond oversight to be constructive and helpful. To probe
 2010 more deeply into the responses to this questionnaire, we will follow up with in-person
 2011 interviews with some respondents. After preparing a report on our findings, we will
 2012 engage in further discussions to help selected programs advance their adaptive
 2013 management planning and actions and adjust the focus of future reviews.

2014 Designing and implementing adaptive management isn't easy, and it is done much less
 2015 often than it is talked about. By thinking about the following questions and then
 2016 providing brief responses, you'll help us suggest whether, when and how adaptive
 2017 management should be used, how it can be improved, and how science can best aid this
 2018 process. The questionnaire is in three parts. **Please provide links to or copies of**
 2019 **documents that you think would help us better understand how you are thinking**
 2020 **about, planning, and/or implementing adaptive management.**

2021 It would be most helpful if you could return the completed questionnaire to **Martina**
 2022 **Koller** (martina.koller@deltacouncil.ca.gov) or **Lauren Hastings**
 2023 (lauren.hastings@deltacouncil.ca.gov) by **November 20**.

2024

2025

2026 **I. A QUICK SURVEY**

2027

2028 We'd like to develop a quantitative understanding of how adaptive management is used
 2029 in Delta programs (after all, we're scientists). **Please assign a value from 1 (strongly**
 2030 **disagree) to (5 strongly agree) to each of the following statements regarding your**

2031 **agency, division, or program (“entity”) and current or planned programs.** (You’ll
 2032 have the opportunity to say more in the sections that follow.)
 2033

2034 I’m responding for (name of entity) _____. The
 2035 entity is an agency, division, program, or other (specify) [**check one**]

2036 1. My entity uses adaptive management as an organizing framework for its activities.

2037 **1** **2** **3** **4** **5** [**Check one**]

2038 2. In my entity’s experience, adaptive management efforts often require collaborations
 2039 among multiple agencies and stakeholders.

2040 **1** **2** **3** **4** **5** [**Check one**]

2041 3. My entity’s broad management plans (e.g., resource management plans) include the
 2042 flexibility necessary to engage in adaptive management.

2043 **1** **2** **3** **4** **5** [**Check one**]

2044 4. Laws and other administrative and regulatory requirements often constrain our entity’s
 2045 efforts to engage in adaptive management.

2046 **1** **2** **3** **4** **5** [**Check one**]

2047 If so, can you list any specific legal requirements that you believe hamper or facilitate
 2048 adaptive management?

2049 5. Changes could be made in existing legal requirements to make adaptive management
 2050 more successful.

2051 **1** **2** **3** **4** **5** [**Check one**]

2052 If so, can you suggest specific changes to existing legal requirements that would facilitate
 2053 adaptive management?

2054 6. We usually build a conceptual model of the management action before implementing
 2055 the action.

2056 **1** **2** **3** **4** **5** [**Check one**]

2057 7. Conceptual models should include both human and ecological systems.

2058 1 2 3 4 5 [Check one]

2059 8. We gather baseline information and/or data about the relevant system(s) before
2060 management actions are implemented.

2061 1 2 3 4 5 [Check one]

2062 9. Monitoring is adequately funded to support adaptive management.

2063 1 2 3 4 5 [Check one]

2064 10. Monitoring and assessment results are integrated into adaptive management decision-
2065 making.

2066 1 2 3 4 5 [Check one]

2067 11. It is important to communicate the results of adaptive management experiments to
2068 stakeholders.

2069 1 2 3 4 5 [Check one]

2070 12. In my entity's experience, when adaptive management experiments tell us something
2071 new, management actions are changed to reflect what is learned.

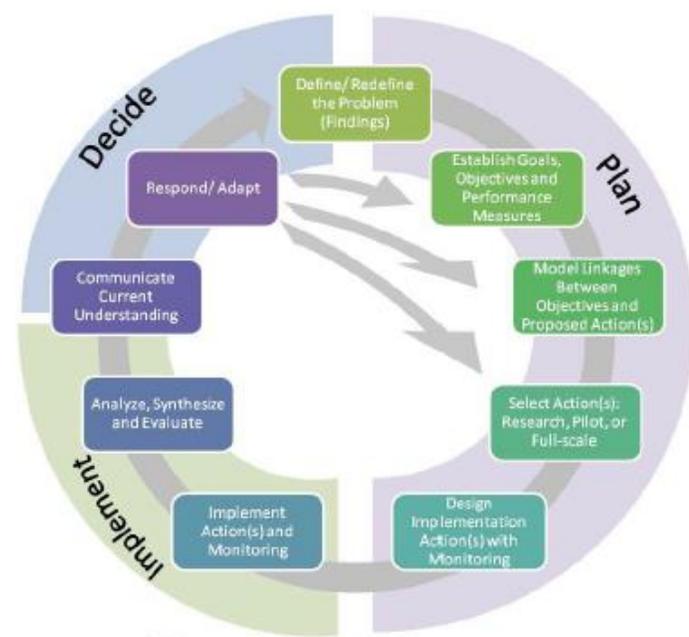
2072 1 2 3 4 5 [Check one]

2073

2074 **II. THE ADAPTIVE MANAGEMENT PROCESS**

2075 In the Delta Plan and the Delta Science Plan, adaptive management is visualized as a
2076 nine-step process. The figure illustrates how these steps are linked in sequence, and
2077 provides a useful framework for describing how you
2078 are thinking about, planning, or implementing
2079 adaptive management.

2080 The following sections relate to each step of this
2081 adaptive management process. **Please briefly**
2082 **describe (a few sentences or short paragraph will**
2083 **suffice) how or whether each step is conducted or**
2084 **being planned in your program(s), along with**
2085 **any comments you'd like to share with us. The**



2086 *questions for each are there to help you think about the step; please feel free to address*
2087 *those questions or respond in any other way that suits you.*

2088

2089 ***Step 1: Define the problem.*** Adaptive management depends on a clear understanding of
2090 the problem to be addressed through some combination of science, management, and
2091 policy. [Click here to enter text.](#)

2092

2093 ***Step 2: Establish goals, objectives, and performance measures.*** Goals and objectives
2094 provide specific guides or targets for adaptive management, and performance measures
2095 indicate whether actions are working well. How are performance measures identified and
2096 employed? What are some common performance measures for your projects? [Click here](#)
2097 [to enter text.](#)

2098

2099 ***Step 3: Model linkages between objectives and proposed action(s).*** Developing models
2100 helps define the structure and relationships of the system being managed. Models may be
2101 conceptual, analytical, simulation (of varying complexities), and involve probabilistic
2102 risks or scenarios. How are you using models, of which type(s)? How do you decide what
2103 kind of modeling is needed or justified, or how detailed it should be? [Click here to enter](#)
2104 [text.](#)

2105

2106 ***Step 4: Select actions: Research, pilot, or full-scale:*** Depending on the situation, the
2107 state of existing knowledge of the system, the uncertainties and risks of undertaking a
2108 planned action, its costs, and other factors, additional research (literature, modeling, field
2109 observations or experiments) may be needed before implementation, or it may be useful
2110 to conduct a pilot study. What is done in your program, and how are decisions made
2111 about what to do? What steps are taken to assemble and make accessible a knowledge
2112 base for the project or problem? How is targeted research incorporated into adaptive
2113 management? [Click here to enter text.](#)

2114

2115 ***Step 5: Design implementation action(s) with monitoring:*** Are details of adaptive
2116 management and monitoring in place *before* a project is started. [Click here to enter text.](#)

2117

2118 **Step 6: Implement action(s) and monitoring.** Monitoring generates lots of data. How are
 2119 data managed? Are data bases linked with other data bases outside the project? [Click here](#)
 2120 to enter text.

2121

2122 **Step 7: Analyze, synthesize, and evaluate.** When is analysis done after or during
 2123 implementation? What kinds of project evaluation are common? [Click here to enter text.](#)

2124

2125 **Step 8: Communicate current understanding.** Communication of analysis results and
 2126 synthesis of scientific data usually requires translation into readily understandable
 2127 messages for managers and decision-makers. When is this done, how, and by whom?
 2128 [Click here to enter text.](#)

2129

2130 **Step 9: Respond/Adapt:** How are decisions made about whether to change goals and
 2131 objectives, revise or conduct more modeling, or conduct additional research or take
 2132 different actions to achieve the objectives? [Click here to enter text.](#)

2133

2134 **III. SOME SPECIFIC QUESTIONS**

2135 Here are a few additional questions that we'd like you to think about and tell us what you
 2136 think, especially the last question.

2137 1. How should one decide when adaptive management is needed or appropriate and
 2138 when it is not? What criteria should be used to make this decision? [Click here to](#)
 2139 [enter text.](#)

2140 2. How have linkages among projects or actions and their effects been considered in
 2141 your planning (or how should they be considered)? [Click here to enter text.](#)

2142 3. What mechanisms exist for bringing scientists, managers, and stakeholders
 2143 together throughout the adaptive management process? [Click here to enter text.](#)

2144 4. What is the role of independent peer review, and in what phases of the process is
 2145 it best applied?

2146 [Click here to enter text.](#)

2147

- 2148 5. How are your adaptive management science efforts funded (or how should they
2149 be funded)? What staff support is needed, with what sorts of expertise? [Click here](#)
2150 [to enter text.](#)
- 2151 6. What legal, regulatory, or administrative barriers to doing effective adaptive
2152 management have (or will) you encountered? [Click here to enter text.](#)
- 2153 7. Given the uncertainties that prompt adaptive management, there is a real
2154 likelihood of being wrong or mistaken. How do you deal with that possibility?
2155 [Click here to enter text.](#)
- 2156 8. How are you incorporating anticipated future conditions (e.g., climate change,
2157 sea-level rise, land-use change) into adaptive management? [Click here to enter text.](#)
- 2158 9. Do you have suggestions for making adaptive management work more
2159 effectively?
2160 [Click here to enter text.](#)
- 2161
2162 10. What question(s) should we have asked but didn't (your answer would be
2163 helpful)?
2164 [Click here to enter text.](#)

2165 **Appendix D. Agencies and Individuals Consulted for this Report**

2166

2167 *Agencies responding to the questionnaire*

2168

- 2169 • California Department of Fish and Wildlife – Ecosystem Restoration Program
- 2170 • California Department of Water Resources – FloodSAFE Environmental
- 2171 Stewardship and Statewide Resources Office (FESSRO)
- 2172 • Central Valley Regional Water Quality Control Board
- 2173 • San Francisco Bay Regional Water Quality Control Board
- 2174 • Suisun Resource Conservation District
- 2175 • U.S. Bureau of Reclamation, Bay-Delta Office

2176

2177 *Individuals interviewed personally*

2178

- 2179 • Dan Castleberry, U.S. Fish & Wildlife Service
- 2180 • Joshua Collins, San Francisco Estuary Institute
- 2181 • Val Conner, Collaborative Adaptive Management Team
- 2182 • Steve Culberson, U.S. Fish & Wildlife Service
- 2183 • Ted Frink, California Department of Water Resources – FESSRO
- 2184 • Les Grober, California State Water Resources Control Board
- 2185 • Bruce Herbold, Environmental Protection Agency (retired)
- 2186 • Campbell Ingram, Delta Conservancy
- 2187 • Gail Newton, California Department of Water Resources – FESSRO
- 2188 • Kim Webb, U.S. Fish & Wildlife Service
- 2189 • Carl Wilcox, California Department of Fish and Wildlife
- 2190 • Leo Winternitz, Collaborative Adaptive Management Team

2191

2192 **Appendix E. Responses to Questionnaire Statements about**
2193 **Adaptive Management** (1 = strongly disagree, 5 = strongly agree)

2194

2195 *The statements:*

2196

2197 1. My entity uses adaptive management as an organizing framework for its activities.

2198 2. In my entity's experience, adaptive management efforts often require collaborations
2199 among multiple agencies and stakeholders.

2200 3. My entity's broad management plans (e.g., resource management plans) include the
2201 flexibility necessary to engage in adaptive management.

2202 4. Laws and other administrative and regulatory requirements often constrain our entity's
2203 efforts to engage in adaptive management.

2204 5. Changes could be made in existing legal requirements to make adaptive management
2205 more successful.

2206 6. We usually build a conceptual model of the management action before implementing
2207 the action.

2208 7. Conceptual models should include both human and ecological systems.

2209 8. We gather baseline information and/or data about the relevant system(s) before
2210 management actions are implemented.

2211 9. Monitoring is adequately funded to support adaptive management.

2212 10. Monitoring and assessment results are integrated into adaptive management decision-
2213 making.

2214 11. It is important to communicate the results of adaptive management experiments to
2215 stakeholders.

2216 12. In my entity's experience, when adaptive management experiments tell us something
2217 new, management actions are changed to reflect what is learned.

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2232 *The responses:*

2233

2234

Question	Respondent						Mean	Range
	Agency A	Agency B	Agency C	Agency D	Agency E	Agency F		
1	4	5	4	2	3	2	3.3	2 to 5
2	5	4	4	5	4	5	4.5	4 to 5
3	4	5	4	2	3	4	3.6	2 to 5
4	3	2	4	5	4	4	3.6	2 to 5
5	2	3	3	5	2	3	3	2 to 5
6	3	4	4	2	4	2	3.2	2 to 4
7	5	5	4	5	5	5	4.8	4 to 5
8	5	4	4	3	3	4	3.8	3 to 5
9	2	2	2	3	2	1	2	1 to 3
10	3	4	3	3	3	3	3.2	3 to 4
11	5	5	4	5	5	5	4.8	4 to 5
12	3	4	3	4	3	4	3.5	3 to 4

2235