

## Agency and Public Comments on the Comprehensive Everglades Restoration Program (CERP) Adaptive Management (AM) Integration Guide

March 12 - April 28, 2010

Unique ID	Location of Change	Comment	Commenter Name	Org or Agency	Action
93	p. 3-40, line 23	Rename this to "Performance Issue Resolution" and streamline the process - it appears never ending with multiple entities involved and no accountability for meeting cost, scope, and schedule if a performance issue arises.	Margaret Wilson	USFWS	This suggestion has not been incorporated because the referenced section describes more than just the resolution of performance issues (i.e., forming a team to develop options to address the issue). As for the comment about the time to address an issue, it will vary depending on the scale of the issue. The process is as streamlined as it can be given current the decision-making framework.
95	p. 3-41, line 11-13	What happened to the PDTs role? Isn't accountability at the most appropriate level warranted here? Why leave this in the hands of an "ad hoc team" who has no accountability for cost, scope, or schedule of the original project?	Margaret Wilson	USFWS	There are some uncertainties during planning that would not need to come to managers if they are easy fixes. Anything that requires extra cost and fixes to regional issues would need to be cleared by management. PDT will likely not be in existence at this point, but an ad hoc team (now called "issue team") will likely involve some of the same people.
4	General	The document is composed and organized in a manner that is easy to follow. The sections are laid out in a logical order with references within easy reach. I found the text boxes with definitions very useful. I would also suggest providing these in a glossary up front with the table of contents and an acronym list if additional space is afforded. In addition, ensure that robust and flexible are included in definitions as these terms are vague and open to interpretation. They are both used but not defined until the reader reaches page 3-23. The examples provided give insight into the AM process; ensure that these are the best examples available.	Emilie Perkerson	USACE	A glossary of terms, including robust and flexible, is included in the final version. Most acronyms (except for a select few) have been removed from the document and replaced with the full spelling. An acronym list has been included.
5	General	How about adding a list of acronyms? This would assist those who read the document and are not so familiar with the project and associated acronyms.	Rich Thomas	USACE Great Lakes	An acronyms list has been added.

40	p. 1-6, line 7-8	This principle should clearly indicate that changes to the governing processes in CERP (e.g. plan formulation, pro regs, etc.) are all worthy of monitoring and assessment to identify if there are better ways to arrive at our plans, designs, implementation methods, etc.	Margaret Wilson	USFWS	The AMIG is not the place for audit of these processes so this suggestion, as stated, was not incorporated. Instead language from NRC (2008) was added to Appendix F describing CISRERP's role, which has no mention of assessing governance processes. The Task Force description in Appendix F also has no mention of this role. The following sentence was added to the description of benefits of the principle on incorporating new information into decision-making in Section 1.4: "This course may involve feedback on and improvement to the process for linking science to decision making and better defining policy, roles, and responsibilities." In the future, CERP managers should consider applying assessment processes such as the Army After Action Reports, or conducting an independent assessment of CERP decision making bodies and processes.
43	p. 1-6, line 30	Include a conclusion for the benefit of applying AM assessments on processes associated with formulating plans, designs, construction, operations, and report generation (including reports in figure 3-5).	Margaret Wilson	USFWS	See response to comment 40
79	p. 3-28, line 39	Monitoring also includes the measurement of how well CERP's governing processes are working. It includes monitoring of all management and decisionmaking processes, report generation processes, and policy-level changes such as monitoring the process to revise the Pro Regs. Revise the definition within the bordered box.	Margaret Wilson	USFWS	See response to comment 40.
84	p. 3-35, line 26	Revise this definition to add a sentence which includes assessment of overall process mentioned in the above comment.	Margaret Wilson	USFWS	See response to comment 40.
7	General	AMIG has come a long way. The AMIG could use more plain speak so AM does not come across as something mysterious.	SFWMD	SFWMD	The AMIG was thoroughly reviewed by a technical writer, who made comprehensive edits to improve readability.
11	General	The way things are stated, it appears that the number 1 priority is to learn. Suggest clarifying that AM and learning are a means to the end of restoration (not ends in themselves).	SFWMD	SFWMD	Language has been added to link uncertainty reduction (and new information) to achieve goals and objectives.
12	General	Replace "learning" with "new information and understanding"	SFWMD	SFWMD	This suggestion has been incorporated.
14	General	In some places the tone is divisive. For example, the first paragraph focuses on how AM is different from our current planning process. Suggestions: Reframe language in the AMIG to build on past experience, acknowledge that the Corps is on the front lines of restoration.	Cheryl Buckingham	USACE	This comment has been incorporated.
15	General	Clarify which AM activities are different from what is already being done. See Orth's Planning Guidance for example of Corps guidance that is written for a lay audience.	Cheryl Buckingham	USACE	The tone has been improved (see response to comment 11) and the project checklist appendix details where the AM activities align and are the same as existing planning activities.
16	General	There is some circular reasoning about the benefits of AM. Add examples of where AM has worked.	Cheryl Buckingham	USACE	Section 1.2 provides examples of types of AM and specific project examples. The case studies included in Appendix A provide further detail.

20	General	"Uncertainty" is a negative term. Use "unanswered questions" instead. The engineering approach to addressing uncertainty is "factor of safety" (e.g. increase strength of supports to support a range of weight loads on a roof). Identify different types of uncertainties, e.g. technical , ecological, socio-economic.	Cheryl Buckingham	USACE	The term "uncertainties" was retained as it is more familiar than "unanswered questions"; however, the term "unanswered questions" is used to describe what an uncertainty is in the context of AM. A definition is provided in the glossary as well as Section 2.2. Added sentence to emphasize that uncertainty is the basis for AM (Sect 1.1). Added language to Sect 2.2 that policy uncertainties are identified early through AM so they do not inhibit progress later. Added language to Section 3.3.5 to clarify that subteam developing AM plan will engage appropriate staff depending on nature of uncertainties.
68	p. 3-15, line 25	This process needs to be streamlined or the down time awaiting approval will add needless time delays to projects. Why isn't AM being integrated into project documents already identified for development? Where is the 'integration' if a separate document is generated instead of within PIRs?	Margaret Wilson	USFWS	Added a sentence to 3.3.5 to state that AM plan is part of PIR. This has been emphasized throughout the document, and it references CGM 56 on how to integrate AM into the PIR for more details.
55	p. 3-9, line 29-30	What are the decision making criteria for the DCT, the JPRB, and the QRB? There should be some indication of how these bodies make their decisions so the PDTs have some idea of what to plan for in advance. Has there been an assessment of how well these decision making bodies are working? Are they saving projects time and money by resolving issues? How timely are they responding to issues when they are presented? Is there a database tracking all issues brought before these bodies and what the outcome has been? Is this data shared across all stakeholders and with all PDTs as an avenue to share lessons learned? Have there been any refinements to the processes these bodies used in their decisionmaking efforts?	Margaret Wilson	USFWS	The process for bringing issues to the DCT is described in CGM 8, which includes the process and template for Issue Papers. The interagency PDT or appropriate sub-team should develop the Issue Paper. There is no process for assessing how well the decision making process is functioning.
17	General	Ensure all quotes are attributed.	Cheryl Buckingham	USACE	This comment has been incorporated.
18	General	Don't treat inanimate objects as animate objects - e.g. "AM" doesn't do things.	Cheryl Buckingham	USACE	Wherever it was possible to replace "AM" with a more specific term it was done.
19	General	Define words the first time they are used - "knowledge" is data that has been peer reviewed. Use of the term "science" is not explained. Does it mean physical, ecological, or social science? Or all three?	Cheryl Buckingham	USACE	An effort has been made to define unfamiliar terms the first time they are used.
21	General	Don't use "learning" as a noun. Instead use "new information"	Cheryl Buckingham	USACE	See response to comment 12.

28	Preface	This section provides a great lead in to the document. I would suggest incorporating the paragraph on page 4-3, lines 7-12. This seems like an important message that would be useful right up front.	Emilie Perkerson	USACE	The Preface has been replaced by an Executive Summary, and key points from the language mentioned have been added.
33	p. 1-2, line 4	why use "nine (9)" and then later in the text (pg 11 line 14 and many other instances) just use "nine" ?	Todd Hopkins	USFWS	Numbers are consistently spelled out throughout the rest of the document, where appropriate.
77	3-26, section 3.5.5	You may want to reference Appendix J in Section 3.5.5 where the document initially mentions thresholds (page 3-26).			Appendix J has been removed from the document as it was found to be too confusing and not ready for inclusion.
108	App A: CERP AM Strategy	Ensure that Appendix A is formatted to look like the rest of the appendices. It currently does not look like part of this document; at least provide a lead in page.	Emilie Perkerson	USACE	The old Appendix A (AM Strategy) has been removed from the document and included as a reference with a link instead.
111	App D: entire appendix	Delete this appendix and incorporate by reference by adding a weblink. The information is redundant and adds to the size of the document. Also, comments made previously to activities and steps apply here to the tables in this appendix.	Margaret Wilson	USFWS	Salient points from this appendix were pulled into the introductions of activities 2-5, and also pulled some into section 2.2.2. The appendix itself was deleted.
115	appendix J	In Appendix J there is no reference to Figure J5 in the text (pages J-5 to J6). The reference to the figure should be added to the text just prior to its illustration.	Rich Thomas	USACE Great Lakes	See response to comment 77.
54	p. 3-8, line 43-44	The Pro Regs are in the process of being revised this year, specifically to address refinements to the Plan Formulation process. Since problems have been identified with the Plan Formulation process, shouldn't those problems be documented clearly so as to be understood by scientists, managers, and stakeholders? Shouldn't the refinement goals and objectives be clearly identified? and lastly shouldn't monitoring and assessment efforts be focused to determine how and whether the refinements proposed are meeting restoration goals and objectives? There is a lack of understanding that policies, practices, and decisions require use of AM principles in addition to science-related aspects of the restoration programs. Perhaps a list of the primary documents that get generated and are subject to the AM process should be included in this document somewhere.	Margaret Wilson	USFWS	The Pro Regs revisions are a separate effort and therefore many of the suggestions in this comment cannot be addressed by the AMIG. The program-level assessment reporting process is outlined in Section 3.7.2 and recommendations are made for project-level reporting, as well as the need for the program and projects to work together during reporting.
13	General	Monitoring and assessment has to be "lean and mean", the right monitoring, for the right amount of time, with a plan to end it if/when it is no longer needed. The potential for AMIG to increase ecological monitoring costs for projects is a concern. The AMIG should state that ecological monitoring should be restricted to key responses and requires management approval.	SFWMD	SFWMD	Language has been added throughout the document that monitoring must be linked to goals and objectives and their associated uncertainties, including language upfront in the Executive Summary.
1	General	My big issue to me is that AM is left for everyone (managers, staff, agencies etc...) to implement and "do the right thing." But there is not one held accountable for when it is misused, ignored or worse - dismissed entirely as unnecessary when it is really needed. Creating a guidance document without linking implementation to a responsible group or parties is unwise. No one can cry foul and have their issue addressed with any certainty. The various interagency working groups (Recover, PRB, DCT, SCG, etc ...) re not empowered to enforce the use of good AM - no one in CERP is so empowered.	Todd Hopkins	USFWS	Appendix D outlines the roles of each of the major entities involved in CERP, and describes the specific responsibilities of those entities during each of the nine AM activities.
8	General	It needs to be clear that management decides when to conduct AM. Conducting Active AM is not just a science decision – it is also a management decision.	SFWMD	SFWMD	Section 3.3.4 describes the need to obtain management concurrence to pursue an AM approach, particularly an active one.

70	p. 3-15, line 31-32	Why isn't the project leader also the lead for incorporating AM into the project? Why is a separate team needed to do this and doesn't this take away much needed accountability from the project team?	Margaret Wilson	USFWS	Added language to Section 3.3.5 to reinforce that the PDT has this responsibility but may use a sub-team to develop the AM plan.
94	p. 3-40, line 42	why is an ad hoc team used here? Aren't performance issues and their resolution of paramount importance not just from the immediate project or process, but also to those projects/processes that will benefit from the lessons learned in addressing performance issues. An ad hoc team conveys the notion that little if any integration is going on from one project/program/process to another also it relieves the project team from being accountable to see the issue through to the end.	Margaret Wilson	USFWS	See response to comments 93 and 95.
42	p. 1-6, line 27-28	It's evident from much of the litigation ongoing, that AM is not the silver bullet to prevent legal action. Delete this sentence or acknowledge what can be done beyond just "promoting" stakeholder engagement to fully inform and keep stakeholders engaged. Two suggestions from Levine are bring them in early and ask for a stakeholder AM group to be formed (Levine, p. 15)	Margaret Wilson	USFWS	This statement has been revised to address this comment and now reads: "Additionally, stakeholder engagement and interagency collaboration can limit costly delays from legal actions and support policy clarifications by building trust and shared understanding." Section 3.1 describes how to engage stakeholders at different levels (i.e., informing, involving, collaborating).
92	p. 3-40, line 19	Revise to include outside stakeholders.	Margaret Wilson	USFWS	Outside stakeholders cannot participate in DCT and JPRB forums, so this revision could not be made. A white paper on options for engaging stakeholders is currently being reviewed, and as the AMIG is a living document it will be updated as necessary in the future. Before moving forward with options, there may be opportunities to discuss in a more open stakeholder venue at the WRAC or South Florida Ecosystem Restoration Task Force.
106	p. 3-49, Activity 8: Feedback to Decision Making	Include stakeholders as part of this process. Their input and feedback are important in identifying options and adjustments and since we're saying this is a collaborative process, we should include them here.	Margaret Wilson	USFWS	This bullet has been revised to read: "• Scientists and managers, with input from non-governmental stakeholders, discuss performance issues requiring action." See Table 3-1.
80	p. 3-33, line 16-17	Why are new metrics being added at this point in the process? Perhaps Interim goals should be substituted here.	Margaret Wilson	USFWS	Decision criteria may be interim goals, performance measures, etc., but are not new criteria. Interim goals are not always at the project scale therefore cannot always be used as decision criteria.
102	p. 3-48, Table 3-5	This is a great summary table. There no reference to it found in text. It might be helpful to include it prior to 3-48, perhaps in the preface, introduction, or beginning of section 3.	Emilie Perkerson	USACE	This table has been moved up and is now Table 3-1. It is referenced in the introduction to Section 3.0.

100	p. 3-46, line 19	Is senior management the same as CERP managers used earlier in the document? Will the corrective action guidance to be used by senior management be documented? How will there be any assurance that some consistent decision making approach for corrective action implementation will exist? Is it important that implementation of corrective actions be done using some kind of standard operating procedure or process? If not, how will improvements to the corrective action implementation process be realized and memorialized?	Margaret Wilson	USFWS	The revised version of the AMIG attempts to better clarify whom makes management decisions and how it is documented in option reports, as stated in activity 8.
29	p. i, line 9-11	a brief description of relevant adaptive management programs ongoing in this country and others and an evaluation and application of lessons learned from those programs to CERP should be included. For example, the paper on "Adaptive management in river restoration: theory vs. practice in western North America" by Jessie Levine, University of CA, Berkeley (2004), identifies 3 themes common to the 10 river restoration projects assessed in the above paper. One element common in all 10 projects was the absolute necessity of leadership and structured coordination in integrating knowledge gained in one location to another - "Lack of leadership is particularly significant in cases with multiple people . . . on different projects . . . testing different hypotheses. Without a distinct person responsible for oversight and coordination of adaptive management, knowledge gained in one location may fail to be integrated . . . and the loss of the information comes at a considerable cost." This document should prove that we can employ Adaptive management from the 'get go' and use the lessons learned from other applied AM programs so CERP doesn't fall into the same pitfalls in its application of AM. The other 2 common themes from the above paper are: 1) a long-term institutional commitment to a new approach for learning, feedback, and improvements including bring stakeholders in early and in on a continuous basis (set up stakeholder AM team) and 2) a long-term, stable source of funding is imperative (pg. 14). Levine's paper, cited to below, has references to several other Adaptive management papers which should be evaluated for use in this guidance.	Margaret Wilson	USFWS	Appendix A highlights four case studies on programs using AM, and identifies lessons learned for each. Section 4 of the AMIG discusses the theme of long-term institutional commitment to new learning. The Levine paper has not been evaluated for inclusion as a reference in the AMIG to date.
10	General	Identifying and communicating uncertainties to management early on is good. The concept of DCUs is important, to distinguish between all the uncertainties, and those that must be addressed prior to implementation. It needs to be clear that the intent of AM is to help CERP move forward, NOT to get bogged down in all the uncertainties that exist. Consider stating that AM is primarily for ecological uncertainties. In CERP, AM has primarily been used because ecological response is harder to predict, especially in complex and rare environments like the Everglades.	SFWMD	SFWMD	AM is to address key uncertainties (regardless of whether they are primarily ecological/engineering; ultimately they are all tied to ecosystem restoration). Language has been revised to clarify that uncertainties should be addressed at the proper time (during planning vs. implementation) so as not to bog down the process.
97	p. 3-42, line 17- 18	If this section isn't deleted then identify who these people are and what criteria they use to judge the right approach? are external stakeholders involved in this at all? if not, why not?	Margaret Wilson	USFWS	This section has not been deleted, but it has been clarified that if the adjustment is within the scope of the NEPA document it does not require external stakeholder review (i.e., options report), but if it is outside that scope (i.e., assessment report) it requires public review and comment. Appendix D clarifies who the entities involved are and Section 3.6.5 discusses decision criteria.

63	p. 3-13, line 19-21	What happened to accountability in this process? When you take responsibility out of the hands of the program/project people for this, there is no incentive for them to devise ways to overcome the hurdles (i.e. uncertainties) - this is a bad move. Plus if project level folks are doing their uncertainty lists, the program level uncertainties are just a roll up of the project list.	Margaret Wilson	USFWS	Language has been changed so that the entity responsible for compiling program-level uncertainties is a CERP Program or RECOVER task team. There will be coordination between the program and project lists.
37	p. 1-5, line 15	The AM strategy has been in effect since 2006. Page 2-1 lines 4 - 5 states the AM has been applied on both a project and program level. So why shouldn't this section on benefits be written based on the benefits realized from those efforts instead of the hypothetical writeups in this section? This section would be more powerful if real-time project/program examples were used as to the benefits received thus far. Include a benefit for assessing processes associated with formulating plans, designs, construction, operations, and report generation (including reports in figure 3-5). Why aren't the benefits, pre-supposed here, going to be monitored and assessed to determine whether each principle is in fact leading to a benefit and not a detriment in meeting CERP's restoration goals? How will we know benefits from these principles are being realized? And if we want to refine these principles 1, 2, 5, or 10 years from now, how will we know exactly how to refine them if we don't know how they've been working or not working? Is it possible that the benefits could be considered working hypotheses which would need to be monitored and tracked for possible improvements through a refined approach to applying the principles involved?	Margaret Wilson	USFWS	The point of this section is to describe the general benefits of AM as part of an overview of AM, not provide examples. Examples are provided in the case studies and in Section 1.2. CERP projects applying AM are still in the early stages and full benefits may not be realized at this point. The benefits of applying AM for the Kissimmee River Restoration project are described in the case studies. The CERP AM Integration Team will be responsible for assessing the benefits of AM for CERP, as stated in Section 4.
53	p. 3-7, line 16-17	Identify who these entities are (are they the DCT, jPRB, QRB?) and what criteria are they using to approve proposed refinements to goals and objectives? Identification of their criteria and an assessment of how well their proposals are working is crucial in a lessons learned context.	Margaret Wilson	USFWS	
82	p. 3-35, line 14-16	Revise to incorporate process assessments in addition to restoration targets. Such things as goals to assess the PIR process, plan formulation, report generation, and senior management decision making should be assessed. Results in response to implementation of these processes should be assessed to determine how well the goals and objectives of the Plan are being met and to determine what specific refinement steps can be put in place to improve them is needed in this section.	Margaret Wilson	USFWS	Establishing a requirement for assessing CERP processes is outside of the purview of the AMIG and is the responsibility of another entity.
86	p. 3-36, line 8	Revise to include more than just monitoring data in determining restoration progress. Add the PIR development process as well.	Margaret Wilson	USFWS	See response to comment 82.
90	p. 3-40, line 1	Revise to incorporate the feedback step for overall performance of processes that produce CERP plans and implement actions e.g. plan formulation - how well is it working or not working? what are the pitfalls? how do improvements to plan formulation get noted and acted on? Are the decision making processes associated with QRB, jPRB, DCT, etc. monitored to determine if they can be improved? Is stakeholder input accounted for in this step? Should it be?	Margaret Wilson	USFWS	See response to comment 82.
101	p. 3-47, line 22	Revise to include monitoring and assessment of decision making processes, report generation processes, and recommendations to policy level changes (such as Plan Formulation and Pro Reg revisions) so that opportunities to improve these critical steps by linking directly to issues collected while processes were monitored, are not lost.	Margaret Wilson	USFWS	See response to comment 82.

105	p. 3-49, Activity 7: Assessment	include assessment of decision making processes, report generation, and processes for recommending improvements to policy level implementation strategies for CERP.	Margaret Wilson	USFWS	See response to comment 82.
23	General	Revisiting goals and objectives seems problematic. Need to get agencies re-aligned on the vision for CERP. EPA's graphic facilitation stakeholder process may be a way to do this (Jim Widell)	Cheryl Buckingham	USACE	The 2010 Shared Definition of Everglades Restoration effort is pursuing this.
91	p. 3-40, line 16	revise to include: the process of receiving decisions from interactive forums, needed policy level changes, and processes to generate high-level reports such as the 5-year to Congress.	Margaret Wilson	USFWS	See response to comment 82.
51	p. 3-1, line 16-23	These entities constitute "management" with decisionmaking authority and as such are part of CERP implementation. Where are the assessment criteria to determine how well their decisionmaking processes are working? Should there be feedback mechanisms to improve what and how these parties make their decisions, the extent and magnitude of project/program level briefings to these groups (which can be staff resource and financially intensive), the uncertainty in the criteria these parties will use to form their opinions in moving forward on guiding and making program/project level decisions and input?	Margaret Wilson	USFWS	See response to comment 82.
61	p. 3-11, line 24	Who is CERP management in this context? Is it the DCT, jPRB, the QRB? There are too many hurdles impeding the job of the PDTs. How is this going to streamline the process, save money, and stop needless delays which is a major criticism made by NAS and other agencies?	Margaret Wilson	USFWS	The AMIG clarified the existing decision making process (see Activity 8 and Appendix D) as well as the roles and responsibilities of decision makers through the 9 activities. Currently there is no process in place to monitor these process (see response to comment 82).
85	p. 3-35, line 33	verifying monitoring data is not the only information that needs to be assessed to determine performance. For example, are we interested in verifying the stakeholder collaborative effort and feedback from participants? The PIR process, the decision making process?	Margaret Wilson	USFWS	See response to comment 82. The stakeholder engagement process is currently being reviewed.
3	General	Decision support is mentioned in the document but who leads it, who trains anyone in it? We need an actual implementation group that can come in and help managers and PDTs use decision support and risk analysis methods. If we don't have this, decisions won't get made because it is easy to just "let the PDT be stuck" and then blame the PDT (this has happened repeatedly with various projects and all it does is alienate the PDT from management).	Todd Hopkins	USFWS	A RECOVER team is working on a process to develop decision support tools.
88	p. 3-37, Fig 3-5	include a bullet for process data collection on needed PIR or plan formulation process refinements. What about an assessment of the process for pulling these reports together? How well are these reports integrating data? Can the processes to produce these reports be streamlined? Do report templates exist that maximize the use of information to inform each of the writing panels for these reports? Are we sure we don't have conflicting information between reports? How do we know there isn't conflicting information? There are 3 reports going to Congress in 2010 (5-year report, the SSR, and the SFER Task Force Biennial), have they been reviewed to assure the adequacy/accuracy of how information is communicated and to verify there are no data inconsistencies? Have they been reviewed to ensure efficiency in there preparation?	Margaret Wilson	USFWS	See response to comment 82. The Pro Regs are the place for any assessments of CERP processes/reports. RECOVER is responsible for the MAP and SSR.

30	p. i, line 2	It is difficult to see the benefits of applying AM after reading this 194 page tome. The AMIG creates the need for additional plans to be written, additional approvals to be sought (with no criteria established for what those approvals will be based on) at various stages of implementing AM, and prolonged development of uncertainty analysis and no centralized coordination for application of any of the steps described in the document. One area this AMIG should discuss is how CERP's application of AM is specifically designed so as to avoid the pitfalls identified in the vast majority of AM efforts in restoration efforts in this country and others. The J. Levine paper is one such example of how 10 river restoration programs in western North America encountered the same problems in attempting to implement AM. Generally, they included high costs to implement, lengthy AM processes which were out of sync with funding cycles, agency and stakeholder impatience with a slow pace due to AM, etc. (Levine page 1). How will this guidance incorporate this knowledge to assure CERP doesn't follow in the same footsteps?	Margaret Wilson	USFWS	AMIG will be improved overtime to clarify the decisions, criteria to make them, and who the decision-makers are. AM plans are new but are intended to be integrated into the PIR to avoid additional work. Other activities require new thinking (monitoring, risk and uncertainty, conceptual models).
87	p. 3-36, line 10	An added responsibility for RECOVER should be to assure the PIR development process is properly assessed and that all the various reports to Congress address MAP data consistently and any needed refinements are part of the lessons learned process.	Margaret Wilson	USFWS	See response to comment 82.
35	p. 1-4, line 34	lists "conflict resolution" as does pg 105 line 7. However, conflict resolution (how it happens and who does it or teaches is) is never really addressed in the section on engaging stakeholders (pg 15) nor it is discussed in pg 16 line 15 under Establish Interagency Collaboration My issue is that conflict management is left to the common good of all to accomplish. Clearly, CERP has shown us that everyone will avoid the conflict and it will fester - despite the need to address it. Creating guidance (the AMIG) is not enough - implementation responsibility must be part of this. Someone or some group must be responsible to address and resolve conflict. Agencies will stick to their mandates and the REC/RLG has never engaged in this way before.	Todd Hopkins	USFWS	Need to raise this issue to be addressed by various CERP teams. Part of it is training; the other is recognizing when to raise issues to management to resolve conflict, and accessing various USACE resources to help resolve this.
89	p. 3-38, line 28-29	This section reads like everyone is in charge and at the same time no one is in charge. With so many entities involved there appears to be little if any accountability. Can't this be streamlined so it is very transparent who prepares reports and what if any management response is needed and also what criteria "management" will use to respond? It would be more productive if a real-life example were used here to depict how this has been working for the last 10 years, how successful it has been, what's been learned, and what improvements are proposed as a result of the learning.	Margaret Wilson	USFWS	The AMIG describes the current decision making process and roles and responsibilities of those involved (see Appendix D). Streamlining this process is outside the purview of the AMIG. Decision criteria are discussed in Section 3.6.5. See also response to comment 3.
25	General	We are grateful for the increased focus that this current draft AM Integration Guide (Guide) places on stakeholder participation throughout restoration processes, and especially the fact that stakeholder engagement is identified as a key indicator of AM implementation success. We encourage investigation into a range of options for facilitating such engagements and collaboration including, but not limited to, those outlined in Section 3.1.4 and Appendix G. While not all of the case studies described in Appendix B can be directly generalized to apply to Everglades restoration scenarios, we hope that the inclusion of information from these case studies will be utilized by the decision-makers following this AM Integration Guide, especially those demonstrations of adapting decisions based on monitoring results.	Julie Hill-Gabriel and Megan Tinsley	Audubon of Florida	A white paper on options for improving stakeholder engagement is currently under review and the AMIG can be updated once decisions are made.

26	General	We concur with the statement in Section 3.6.1 that “[a]n essential element of AM is the development and execution of a scientifically rigorous monitoring program.” While the long term monitoring responsibilities are not completely identified in this Guide, the principles outlined in the Guide should be followed. As the monitoring responsibilities are further determined, we urge that individuals with relevant scientific expertise, including those associated with non-governmental stakeholder groups, have input into the monitoring process.	Julie Hill-Gabriel and Megan Tinsley	Audubon of Florida	The following sentence has been added to Section 3.6.1: "Designated contacts will ensure that results are shared with the partnering agencies and non-governmental stakeholders for the duration of the monitoring plan." See also response to comment 25.
38	p. 1-5, line 22-23	"A fundamental tension in stakeholder-involved adaptive management is that increasing stakeholder participation tends to lengthen the process (requiring multiple iterations of each step)" (Levine, page 15). How does the AMIG, knowing this, get ahead of the curve and try to address what we know CERP is headed for with this principle? Is there any consideration to rousing up some support from the stakeholder community for them to form an Adaptive Management subgroup? The pros and cons of this idea should be evaluated before it is summarily tossed aside. There is evidence in the Levine paper (referenced on page i) that this can work.	Margaret Wilson	USFWS	See response to comment 25. Options are currently being developed and will be evaluated.
52	p. 3-2, line 1-2	Without an assessment and feedback step indicating how well the collaborative effort is going with various parties, there is no true AM integration with this activity. There is no description of how feedback from the collaborative planning efforts is incorporated into refining this activity in the process. In order to assure that this step is working as well as possible, shouldn't there be an outreach effort to get feedback on how well these groups feel specific collaborative efforts performed?	Margaret Wilson	USFWS	This is a good comment and should be elevated to CERP managers for consideration.
114	p. J-i, App J	Why are we introducing yet another set of values that let us know if we're approaching our original set of PMs? What happened to Interim Goals? This appendix should be deleted and reference in the text that cites to this appendix should be sent to the IG/ITs by either weblink or incorporate document title by reference.	Margaret Wilson	USFWS	This appendix was deleted.
72	p. 3-21, line 25-26	The IDS should be established with uncertainty already factored in. Why call it an integrated delivery schedule if PDTs have to first determine uncertainty and if it turns out that there are many DCUs for a particular project won't the time delay in dealing with the DCU process take the project out of sequence anyway?	Margaret Wilson	USFWS	This is a good comment and RECOVER is prepared to provide scientific input to the IDS when requested.
73	p. 3-21, line 39-42	When performing this sequencing, why aren't uncertainties used in this process so the PDTs can then formulate plans to address those instead of having to work with already prioritized and sequenced projects when they begin project planning? This might be a way to streamline the PDT processes.	Margaret Wilson	USFWS	See response to comment 72.
99	p. 3-43, line 14	How are the decisionmaking processes for these parties monitored, assessed, and refined? If they're not monitored, are we losing opportunities to improve how they make performance decisions? Isn't that part of what adaptive "management" is all about in addition to the technical data being assessed and decisions refined?	Margaret Wilson	USFWS	See response to comment 82.
107	p. 4-1, whole section	Delete this section in its current form and change it to a table including: a column identifying the criteria, a column for identifying ways to obtain the information to fulfill the criteria, a column that cross references to databases where information and success measures/results reside. As it currently reads, the whole section is redundant.	Margaret Wilson	USFWS	This entire section has been revised to focus on assessing whether the AM process is working.

57	p. 3-10, line 9	What purpose does this concurrence serve? Please state them here? For example, is concurrence to assure consistency from one AM approach to another? Will the same managers from each participating agency provide this concurrence? What will be the criteria management will use to concur or not without the benefit of the brainstorming sessions on uncertainties? What will be the qualifications of the managers concurring or is being a manager the sole qualification? Shouldn't this AM guidance document provide the flexibility and latitude to allow PDTs and Programs to move forward on projects with the AM component integrated through the process provided herein?	Margaret Wilson	USFWS	Management concurrence is required to achieve consistency and obtain agreement that a DCU needs to be addressed to complete the PIR so that funds/resources will be allocated. CGM 56 provides more detail.
58	p. 3-10, line 22-24	This sounds like an overly burdensome approach as well as a time consuming one. Why can't the restoration managers involved go from prioritizing uncertainties to identification of those passive and or active AM activities and put that in their PIRs? who is CERP management for purposes of this approval condition? If there is no dedicated set of consistent management on this, how will there be any consistency in approach? The way it's written, we're developing a plan to describe an approach, to determine a scope to address an uncertainty . . . can't we streamline this and save some time and money in the process?	Margaret Wilson	USFWS	The AM plan is part of the PIR so it is not a separate effort. The AMIG has tried to streamline this process. CERP management chair is DCT/QRB/JPRB. CGM 56 provides more detail on this. Also see Section 3.5.4.
74	p. 3-22, line 7	What does the cost estimate say for costs associated with stand alone AM plans? Has this been compared with costs associated with integrating AM into the project plan documents? Intuitively, does it seem like the cost savings across projects and CERP as a whole would be significant? Intuitively, does it seem like there is some merit in integrating AM into the project plans? If the answers are yes, is it possible this information and data can be presented to senior managers in hopes of changing the policy from stand alone AM plans to integrated Project/AM plans?	Margaret Wilson	USFWS	AM plans are not stand alone - they are part of the PIR.
36	p. 1-5, line 1	A bullet is needed to employ process improvement assessments for processes associated with formulating planning, designs, construction, operations, and report generation (including reports in figure 3-5). Without this principle there is no ability to properly and systematically refine those processes with information collected to use as lessons learned. This year, the Pro Regs are in the process of being updated and strategy papers are being written specifically for how to improve on the plan formulation process, however, the team has no lessons learned data to use to base specific refinements on. Pro Reg revisions and report generation require an AM component in order that refinements proposed are based on lessons learned. Also, this year, an SSR, a Task Force Biennial report, and a report to Congress are due, there is little if any integration on the information being used to generate these reports. A significant taxpayer savings via federal staff time and paper savings can be realized if all these reports were streamlined and a base of information is used to produce them or perhaps and incorporation by reference approach. For example, the draft SSR for 2009 is year is over 300 pages, the Draft 2010 report to Congress is almost 150 pages, and the draft Biennial Report of the Task Force for 2008-2010 is likely to be over 150 pages based on the 2006-2008 report.	Margaret Wilson	USFWS	See response to comment 82. The SSR and Report to Congress were well coordinated this year and are consistent. Efforts are being made to better coordinate the Task Force Biennial Report and the SSR in the future.

p. 2-1, line 12- 47 13	At what level is AM used to integrate lessons learned into revisions of the guiding authorities in CERP such as Pro Regs and Plan Formulation? For example, a proposed regional PIR is being proposed in this year's proposed Pro Reg revisions. What assessment tools were used and where is the analysis of why lessons learned at the PIR project level needs to be refined? This section should be revised to incorporate AM into assessing the program authorities and guiding principles.	Margaret Wilson	USFWS	The Pro Regs team will review and assess changes to be made in these processes. See response to comment 82.
p. 2-5, line 13- 49 14	In what step is there an analysis of the planning process itself? How will we be able to refine it for purposes of updating the Pro Regs is there is no way to analyze how well the overall process is working?	Margaret Wilson	USFWS	See response to comment 82. This is the responsibility of Planning and part of Corps policy, which is being reviewed as part of the Principles and Guidelines and through the Pro Regs team.
p. 3-15, line 12- 67 14	For the roles of the RLG, DCT, JPRB, QRB here, good practice would dictate that the track record of the decision making capability of these groups should be revisited before this step is put in the hands of these bodies. In summary, it would appear that alot of time, money, staff resources, go into putting together what these groups seem to want in order to fulfill a role or function they have been given. Also, tracking the extent to which any of these groups have truly contributed to past project successes should be identified and lastly, given all the work the programs/projects team have done to get to this point (looks pretty extensive), there should be some criteria, threshold, yardstick, reference point, something that this group uses as guideposts to make their decisions in addition to the positions they hold within their respective agencies. Also, by revisiting the process of these bodies, lessons learned could be applied in order to improve their decision making process role.	Margaret Wilson	USFWS	The AMIG clarified the existing decision making process (see Activity 8 and Appendix D) as well as the roles and responsibilities of decision makers through the 9 activities. Currently there is no process in place to monitor these process (see response to comment 82). The DCT has changed their meeting schedule to meet more frequently as a result of self-assessment.

75	p. 3-23, line 31	<p>Management action includes all management actions in CERP including the USACE planning process itself. For example, the Pro Regs team will be proposing Regional PIRs to account for the disparity between trying to distinguish restoration alternatives configured at multiple spatial scales with small hydrologic changes across landscape scale ecological systems. In hindsight, there should have been a structured assessment of the specific issues associated with applying plan formulation across all projects in order for specific refinement techniques to be proposed and then the cycle of monitoring how well those techniques are working should continue. Adaptive management should apply to the CERP governing processes as well including such things as the (1) the decisionmaking processes of different management levels and with different parties involved (e.g. QRB, jPRB) (how well are these processes working? Do they need to be refined? Can we get senior level decisions in a more timely way which saves money? If so, what specifically might need to be assessed about the way it's working now?), (2) processes used to determine needed policy level changes (e.g. recommendations to revise the plan formulation process to a regional PIR approach, new Pro Regs), and (3) the processes that govern who, how, what, and why of report generation for all high-level CERP reports such as the 5-year to Congress, the SSR, the Task Force Biennial report, etc. – does anyone know if these reports are using the same base of knowledge learned in one reporting year to another? Is there a way that preparation can be optimized by using "core" maps, tables, figures, etc. instead of the way it is now where each report has its own separate way of displaying information? Are we really portraying the progress and status of CERP projects adequately and accurately by using different indicators, goals, PMs, and IGs (see the 3 reports being generated in 2010 and all the different status of results sections)?</p>	Margaret Wilson	USFWS	See response to comment 82, 67, 36, and others above.
81	p. 3-35, line 1	<p>Assessment is more than verifying/assessing monitoring data. It also includes assessment of how well the overall PIR development process worked, from plan formulation, to uncertainty analysis to the final spread of alternatives. If not, then a crucial information collection step is missing when it's time to refine the steps in the process. This is presently occurring in developing revisions to the Pro Regs. There are no specific lessons learned identified and shared regarding issues with the current Plan Formulation process, however the Pro Regs are going to be revised with a proposal to refine the process without any targeted necessary changes that need to occur based on lessons learned. All we have is a general sense of the following: the analysis to meet NAI requirement is unreliable for comparing inter-project relationships with restoration goals and objectives, the hydrological and ecological metrics are difficult to apply because CERP's modeling resolution is inadequate to distinguish between restoration alternatives configured at multiple spatial scales and inadequate in defining linkages between small hydrologic changes and landscape-scale ecology.</p>	Margaret Wilson	USFWS	See response to comment 82 and others above.
83	p. 3-35, line 18	<p>Challenges encountered in the following should be identified: trying to apply any and all of the steps in the PIR process, implementation of senior manager decisions, report generation, etc. can be significant in the ability to meet restoration objectives and should be identified here.</p>	Margaret Wilson	USFWS	See response to comment 82 and others above.
6	General	<p>I want to say that you have put together a very good document and it should serve as a first-rate reference to others. It also agrees quite well with the draft USACE PDT AM Guide.</p>	Rich Thomas	USACE Great Lakes	Thank you.

2	General	As Vice President of SAFER, Inc. I have welcomed Adaptive Management, if it is what it says it is !! I believe a project should start out with the least invasive method first, see if it works, then proceed from there. Example: Backfilling canals- Once you fill in a canal, it is gone. If you start out by just removing the levee, or breaching the levee, and then study it's effects, you will have the least invasive method first. If that works, fine, if not, then go to partial backfill, and so forth. That's my idea of Adaptive Management. A case in point, the Tamiami Trail Project. A test site was to be done to see if cleaning out 2 culverts, and clearing out a spreader swale South of Tamiami, Trail. This was NEVER done, and yet the Tamiami Trail Project has started, by raising the road and building a 1 mile bridge. This is NOT Adaptive Management. So now my question is, "Are you REALLY going to proceed with Adaptive Management in other phases of Everglades Restoration?"	Rick Persson	SAFER, Inc.	Several forms/scales of AM implementation: Some are incremental; some are by larger projects/operations changes.
22	General	"Active" and "passive" AM are just another way of saying one, and a series of pilot projects. Kissimmee is an example of this	Cheryl Buckingham	USACE	There is some correlation here, but the main point is number of hypotheses being tested. CERP program implementation with the MAP and CERP AM strategy is a Passive AM approach with some active AM pilots. CERP however is not one big pilot. This version of the AMIG tried to clarify the definitions of passive and active AM.
24	General	Audubon of Florida strongly supports the use of Adaptive Management (AM) as an essential means of integrating the vital contributions of scientists and managers in planning, implementing and assessing Everglades restoration projects including the Comprehensive Everglades Restoration Plan (CERP). Because restoring natural ecosystems is such a complex undertaking, key questions remain incompletely answered about how the natural system will respond to different management actions and decisions. We expect that the AM Integration Guide will facilitate flexibility in the CERP implementation process to allow for the greatest ecological benefits as it advances understanding of the system's resiliency.	Julie Hill-Gabriel and Megan Tinsley	Audubon of Florida	CERP agencies implementation of adaptive management activities listed in the CERP AMIG is intended to facilitate flexibility in the CERP implementation process to maximize ecological benefits, as we better understand the system's resiliency.
27	General	Finally, we support the description of the Guide as a living document. As individual projects progress through the CERP process from the planning, to construction, operation and management stages, substantial improvements in our understanding of the ecosystem's response to restoration efforts should occur, and so too should our understanding of how best to integrate AM into our CERP processes.	Julie Hill-Gabriel and Megan Tinsley	Audubon of Florida	Yes, the CERP AMIG is a living document and will be updated to ensure the best guidance is available for CERP agencies and stakeholders to implement AM to improve restoration success.
31	p. i, 1st pg, 4th sentence	I would suggest changing the sentence to read: "The AMIG describes how to integrate AM principles into existing CERP processes." This would remove "to avoid creating additional administrative burden for CERP project delivery team members". I maybe wrong here or I am missing something but that portion of the original sentence, that I suggest be removed, seems out of place.	Rich Thomas	USACE- Great Lakes	The Executive Summary has been significantly revised, and the following sentence has been included to convey the intended message: "The integration of adaptive management principles into CERP is expected to improve restoration success by addressing restoration issues and uncertainties at the proper time, and is not intended to add process or cost."
32	p. i, line 29	The citation to the Levine report is: Levine, J., 2004. Adaptive management in river restoration: theory vs. practice in western North America. <i>Water Resources Center Archives</i> .	Margaret Wilson	USFWS	This reference has not been included in the AMIG, but as it is a living document it can be added if determined appropriate later on.

39	p. 1-5, Section 1.4-1.5	It would be helpful to assign numbers instead of bullets to the AM principles listed in section 1.4 so they will be directly linked to the discussion of them in section 1.5.	Emilie Perkerson	USACE	We made the principles bullets instead of numbers so as not to confuse them with the activities.
41	p. 1-6, line 22-24	What information exists to prove this point? The Levine paper states the exact opposite (Levine, page 1).	Margaret Wilson	USFWS	This point is supported by the fact that AM provides more certainty in achieving project/program benefits and is likely more efficient over the long-run, than making already expensive investments in ecosystem restoration response, and taking the risk that if the non-flexible/robust design doesn't achieve much benefits. A corrective action that is likely more expensive in the end will need to be taken to be able to improve the likelihood of achieving those desired benefits. Also, with out prioritized/hypothesis directed monitoring, the second investment may have the same risk of not achieving benefits because limited knowledge was gained to improve the restoration design.
44	p. 1-6, line 33	What real benefits are we talking about here? The potential future ones or ones that might exist today?	Margaret Wilson	USFWS	Potential future ones; and some that exist today.
45	p. 1-6, line 33-36	There is no linkage between the logic/reasoning and the conclusion in this statement. Are you saying that because Everglades restoration has numerous uncertainties that affect the chances of restoration success, CERP AM is being applied at the program level? Why is the program level the key for this? Won't program level implementation compound uncertainties as a result of the cumulative project uncertainties that make up the program? More explanation is needed as to why CERP AM is applied at this level.	Margaret Wilson	USFWS	This conclusion has been removed. See Section 2.1 for discussion of CERP AM at the program level.
46	p. 2-1, line 3	after implementation add "planning", since WRDA does include planning and AM principles should be applied to the planning and formulation phase of CERP for purposes of learning lessons that can be applied to the refinement stage ongoing for plan formulation.	Margaret Wilson	USFWS	For the sake of this statement, planning is included in implementation.
48	p. 2-2, line 29	A regional/subsystem approach to plan formulation is being proposed as a revision to the Pro Regs. Is this because there was uncertainty at being able to realize visible system-wide benefits using the hard-to-quantify individual project scale benefits? and if so, isn't that an example and a reason to include AM at this level of policy and management of the Plan? Shouldn't funding uncertainties be addressed here?	Margaret Wilson	USFWS	As discussed in Activity 3, this is part of the reason management is brought in for concurrence on an AM approach to address uncertainties. See CGM 56 for more detail.
50	Section 3	Section 3 is long. I understand that this is essential information, but if the audience of the document is the PDT, then I would consider (if possible) separating project level information from the system wide level, or pursue another method to help break it up a little bit.	Emilie Perkerson	USACE	Appendix C is the project Check List and it will be linked to parts of the document that explain each task. The CGM on AM and Planning will soon be the formal guidance for PDTs during planning phase
56	p. 3-10, line 1-2	What is the typical timeframe to accomplish this? Should a timeframe be set up? Should a schedule to complete this be based on the 'ballpark' cost for the project i.e., costlier projects take more time to identify and prioritize uncertainties than less costly projects?	Margaret Wilson	USFWS	10 days to initially identify as part of the problems, opportunities, objectives process; and 15 days to prioritize. The list will likely be updated throughout the planning and implementation process.

59	p. 3-10, line 26	Why not establish a threshold for this identification which, once it's reached, the restoration managers are advised to perform a "pilot" effort. This effort can take many forms including showing some progress in the field and has the potential to save time and money on generating documents, as well as narrowing the range of uncertainty.	Margaret Wilson	USFWS	We have tried to ensure that this guidance is not too prescriptive, so that there is flexibility in how uncertainties are addressed.
60	p. 3-11, line 23	Can we not overcomplicate what an uncertainty is and just prioritize them? Won't non-decision-critical uncertainties fall to the bottom of the prioritization anyway? Why create another acronym when we don't have to?	Margaret Wilson	USFWS	This is included to provide some guidance on what a prioritized uncertainty looks like, so that the program and projects focus on those uncertainties that are most critical to moving forward, and are linked to goals and objectives.
62	p. 3-12, line 2-3	Why does both the top and the bottom of this figure start and end with prioritizing uncertainties - it would appear that our job has become prioritizing uncertainties instead of restoration when you look at this cumbersome process.	Margaret Wilson	USFWS	Removed "Prioritizing Uncertainties" from the top of the figure because the figure title contains this language.
64	p. 3-14, Fig 3-2	Is there any general sense as to how long it took to develop these? was it in one meeting or one month or several years of planning for this project? I ask this only because time is money and if we can improve how quickly the PDT developed this and moved on, then maybe we can adapt to improve this process.	Margaret Wilson	USFWS	This list was pulled together by the Northern Estuaries team members from the Monitoring and Assessment Plan and a few weeks of coordination. The list will vary depending on the scale and complexity of the issue and how much is known and not known about the subject. The list of uncertainties is something that should be updated over time to move more items over to the known column. In many cases, new uncertainties will be identified. that might be added and prioritized.
65	p. 3-14, line 30-32	This is a perfect example of when uncertainties become too great, then go to the field with a pilot and get on with work. Why can't this threshold analysis be used to get into the field instead of seemingly endless uncertainty analysis and approval processes by bodies outside the PDT?	Margaret Wilson	USFWS	The goal is to get through the uncertainty analysis, prioritize, and develop specific strategies during planning or implementation that address the uncertainties and continue moving on with formulating, designing, implementing the project. These prioritized uncertainties and recommended strategies need to be approved by managers to receive the budget and resources, schedule to accomplish them.
66	p. 3-15, line 4	This process needs to be streamlined or the down time awaiting approval will add needless time delays to projects.	Margaret Wilson	USFWS	In most cases, issues will be resolved by PDT. If they require additional time and resources, the DCT will need to approve at one of their weekly meetings. This should help support a more streamlined approach.

69	p. 3-15, line 30-31	A separate plan for AM? Why isn't AM being incorporated into the key CERP documents generated now? What is the estimate for additional project expenses due to the creation of another plan?	Margaret Wilson	USFWS	Adaptive management plans and components of the plan can be developed and incorporated right into the PIR. Ultimately, the requirements of a plan need to be all contained in the PIR for any adaptive management strategies/options to be approved during construction and implementation. Cost of implementing adaptive management will vary depending on the scope of the issues being addressed. It should be considered a part of good planning. Some commenters were concerned that not having a stand alone AM plan, minimizes its value. The USACE guidance also requires development of an Adaptive Management plan. Done well it could be integrated into the PIR and have a short summary of the components of an AM plan that ties the pieces together.
71	p. 3-18, line 11	Too much narrative in this section. Incorporate by reference to source documents and streamline this section to its essential points.	Margaret Wilson	USFWS	This section has been revised to improve clarity and conciseness of the discussion of performance measures and targets.
76	p. 3-26, line 16	Streamline and incorporate this into the planning phase – save time and money and do away with the need for a separate plan and integrate AM into the project.	Margaret Wilson	USFWS	See response to comment 69
78	p. 3-27, line 13	Delete the need for a separate plan and integrate AM into the project.	Margaret Wilson	USFWS	See response to comment 69
96	p. 3-42, line 4	Delete the Options Report section. why go through the time and expense to produce a report? There should be an out briefing with the appropriate decision making body, lessons learned notes from the briefing documented, shared with other PDTs for the record and then keep the project on track.	Margaret Wilson	USFWS	In straight forward cases, the options report would be documented by the project point of contact (project manager or maybe planning technical lead). In other cases, the issue may involve multiple projects, the options are not as straightforward, and require a task team to be identified to address the issue. The resulting options report would be concurred by the Design Coordination Team, and/or Joint Project Review Board/Quality Review Board
98	p. 3-43, line 10-11	This process needs to be streamlined, it's way to convoluted and appears as a major time delay in coming to resolution and moving on.	Margaret Wilson	USFWS	This is a the current CERP decision-making process describe in several management documents (Master Agreement/CGMs/Programmatic Regulations). Future efforts to update the AMIG, may include feedback and reexamination of the science feedback to decision-making process.
103	p. 3-48, Table 3-5 element: Begin AM plan development	Delete developing a standalone plan and change it to integration strategy with existing CERP documents.	Margaret Wilson	USFWS	See response to comment 69

104	p. 3-48, Table 3-5 element: Finalize AM plan, which includes an overview of chosen AM	change "plan" to "integration strategy" - separate plans are costly and you lose the integration if they're separate from project/program planning.	Margaret Wilson	USFWS	See response to comment 69
109	App A: CERP AM Strategy	This strategy is 4 years old. Have we learned anything in that time that would warrant it's revision? Is this strategy subject to being adaptable in the event we learned something by applying it over the last 4 years? For example, if one of the goals of CERP AM as stated on page 1 is "to support improved decision-making and Plan performance over time", shouldn't decision making processes and the need for recommended policy level changes be part of the elements monitored, assessed, and improvements feedback into Plan performance? If so, the strategy should be revised to reflect the need to track those items as well.	Margaret Wilson	USFWS	The CERP AM strategy was reviewed and commented, and one of the main comments was the need for a more detailed adaptive management technical guide that was integrated into the existing CERP process. That identifies who, how, what, and when activities occur to implement adaptive management for CERP restoration.
110	App B: entire appendix	Delete the case studies from the document (streamline) and incorporate them by reference and use a weblink for the reader.	Margaret Wilson	USFWS	Case Studies are mentioned in the main part of the technical guide, but are not documented anywhere outside of this appendix.
112	App F	Streamline and reduce to one page by incorporating by reference the titles of the documents that describe these R&Rs.	Margaret Wilson	USFWS	This appendix was developed to be a stand alone reference of CERP entities implementing the CERP Adaptive Management efforts.
113	p. G-6, Table G-2	Do the stakeholders have a say in whether the collaborative effort they have been a part of has been successful? needs improvement? will they be surveyed or will their feedback be documented so it can be evaluated for purposes of refining the the overall stakeholder involvement process? Revise this section to include feedback mechanisms from stakeholders and the process refinement step.	Margaret Wilson	USFWS	This appendix was integrated into the main body of the CERP AM Integration Guide. Stakeholder feedback on the collaborative process could be incorporated into the decision-making process described in activity 8. While specific mechanisms to obtain that feedback are not listed, they could be part of the annual USACE/SFWMD stakeholder feedback survey, and/or a recommendation by any CERP agency to undertake such an assessment.
9	General	It needs to be clear that management decides when to conduct AM. Conducting Active AM is not just a science decision – it is also a management decision.	SFWMD	SFWMD	This issue has been clarified in the revised version of the CERP AM Integration Guide as part of the Executive Summary, Introduction, Sections 2 and 3.