

Final Evaluation Findings

American Samoa Coastal Management Program

July 2005 to May 2015

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Executive Summary

The Coastal Zone Management Act requires the National Oceanic and Atmospheric Administration (NOAA) to conduct periodic evaluations of the performance of states and territories with federally approved coastal management programs. This evaluation examined the operation and management of the American Samoa Coastal Management Program administered by the American Samoa Department of Commerce, the designated lead agency, for the period from July 2005 to May 2015. The evaluation focused on three target areas: Project Notification and Review System (PNRS) Permitting Process, Community Engagement and Partnerships, and Growing and Maintaining Local Capacity for the Coastal Program.

The findings in this evaluation document will be considered by NOAA in making future financial award decisions concerning the American Samoa Coastal Management Program. The evaluation came to these conclusions:

Accomplishment: The American Samoa Coastal Management Program has developed technology-based solutions to significantly improve its permitting program. The development of the Project Notification and Review System dashboard, use of tablets by the staff, continued use and updates of GIS data to support decision-making for land-use permit applications, and the development of the web portal have enabled staff members to make more informed decisions and improved the efficiency of the permitting program. In addition, the coastal program is able to provide up-to-date information to members of the Project Notification and Review System Board and other agencies.

Accomplishment: The American Samoa Coastal Management Program is successfully engaging with communities through outreach and education efforts such as the annual Coast Weeks events, the Fautasi Coastal Challenge, and village outreach events. The coastal program has built collaborative and important relationships at the village level and is responsible for organizing successful events to better educate the public about American Samoa's coasts and their programs, policies, and efforts.

Accomplishment: The NOAA Office for Coastal Management recognizes the American Samoa Coastal Management Program's leadership and coordination of an interagency GIS User's Group, which has resulted in the user group creating land use and marine web portals (portal.gis.doc.as) that support the Project Notification and Review System permitting process, as well as resource management efforts of partner agencies in American Samoa.

Accomplishment: The coastal program staff is commended for its long-standing dedication and hard work for the American Samoa Coastal Management Program. The veteran staff maintains a wealth of institutional knowledge and exemplifies the long-term dedication within the program, while new staff members are eager and bring fresh perspectives. All staff members have demonstrated their ability to fill gaps as needed, such as required for the implementation of the Coast Weeks and Fautasi Ocean Challenge programs. Staff members have also expressed ongoing

interest in training opportunities to better perform their duties within the American Samoa Coastal Management Program.

Recommendation: The NOAA Office for Coastal Management recommends the American Samoa Coastal Management Program consider additional opportunities to collect, track, and share existing and new data streams across Project Notification and Review System agencies, and ensure that the data are in a usable format and the results incorporated into planning activities. In addition, the coastal program should work with its partner agencies to identify data and data analyses that the coastal program and the networked agencies could use to improve communication, efficiency, and efficacy of the Project Notification and Review System process for coastal management, specifically in the areas of project tracking, permit archiving, and GIS data—that is, analyzing permit citation data to identify major or common violations to better inform education and outreach efforts.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve coordination of the networked coastal management program agencies and implementation of the permitting program by implementing the following:

1. The American Samoa Department of Commerce and the networked agency partners of the American Samoa Coastal Management Program should review and update the existing memorandum of agreements that guide implementation of the coastal management program. The review should ensure that all agencies still agree to their roles and responsibilities in implementing the federally approved coastal program and reaffirm the commitments therein with Project Notification and Review System Board members, and update memorandums of agreement as needed. If changes to the agreements are determined to be needed, revisions should be submitted as a program change to the NOAA Office for Coastal Management.
2. The American Samoa Coastal Management Program and Permit Notification and Review System Board should meet semiannually outside of the regularly scheduled board meeting to identify improvements to be implemented and to evaluate the results of any improvements to the permitting process.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve Project Notification and Review System enforcement efforts, especially in wetlands areas. The coastal program should analyze enforcement needs and develop strategies that meet the identified needs. The development of strategies should include consideration of opportunities to better leverage existing enforcement capacity across Project Notification and Review System partners.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve the implementation of the permitting process and transparency by

1. Developing a comprehensive checklist for each Project Notification and Review System member agency, if one doesn't already exist, to document each step that needs to be completed to ensure a full review of a permit application before the application goes to the Project Notification and Review System Board for a vote.
2. Creating a Project Notification and Review System handbook that describes the benefits of having a permitting program, clearly lays out the permitting process and all requirements, and includes the comprehensive checklists from above. The handbook should be shared with Project Notification and Review System member agencies to improve coordinated decision-making, and be shared with the public to better assist applicants in understanding and navigating the Project Notification and Review System.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program build on its successful education and outreach efforts by making the Project Notification and Review System permitting process a central theme for all outreach, since the Project Notification and Review System continues to be the coastal program's most influential public interface driver with its legislative authority, mandates, and clear outcomes.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program lead the development of policies, rules, and regulations for the designated special management areas in American Samoa to allow for increased opportunities for leveraged work on the ground by relevant territorial and federal agencies.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program provide professional development opportunities to staff members to maintain and grow internal capacity. The coastal program should develop partnerships with other agencies to leverage trainings brought to American Samoa and develop a presence at the American Samoa Community College to increase awareness of local students about career opportunities in resource management.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program develop a timeline and process for conducting a capacity assessment to identify current and needed skill sets that fulfill the long-term goals and near-term strategies of the coastal management program. The assessment should include an outline of priority capacity-building actions and a proposed timeline and process for implementing these actions. NOAA's Office for Coastal Management will provide technical assistance, as needed, to assist the program in completing the timeline and process for the capacity assessment.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program continue to provide a report on personnel and hiring status in the semiannual performance reports, including the status of all positions, how long any open position has been vacant, and efforts toward the filling of any open position.

Necessary Action: The American Samoa Coastal Management Program must fill positions in a timely manner and ensure positions are filled with candidates that meet the minimum requirements of the position description. In particular, the Program must fill vacant senior technical positions (e.g., the Environmental Planner) to address a historical staffing gap within the program and provide the necessary mentorship, guidance, and training for existing staff and apprentices to achieve the program's long-term approach. The Program should document progress toward addressing this necessary action in the semi-annual performance reports and by providing the minimum requirements of any vacant senior technical positions.

This evaluation concludes that the American Samoa Coastal Management Program is successfully implementing and enforcing its federally approved coastal management program, adhering to the terms of the federal financial assistance awards, and addressing coastal management needs identified in section 303(2)(A) through (K) of the Coastal Zone Management Act.

Program Review Procedures

The National Oceanic and Atmospheric Administration (NOAA) evaluated the American Samoa Coastal Management Program in fiscal year 2015, conducting a site visit on May 26-29, 2015. The evaluation team consisted of Susie Holst, NOAA evaluation team lead; Hideyo Hattori, NOAA site liaison; Jean Tanimoto, NOAA Pacific Islands Region; and Leo Asuncion of the State of Hawai'i's Office of Planning. The support of the American Samoa Coastal Management Program staff members was crucial in conducting the evaluation, and their support is most gratefully acknowledged.

NOAA sent a notification of the scheduled evaluation to the director of American Samoa's Department of Commerce, published a notice of "Intent to Evaluate" in the *Federal Register* on April 16, 2015, and notified members of American Samoa's congressional delegation. The coastal management program posted a notice of the public meeting and opportunity to comment in *Samoa News* on April 10, 2015.

The evaluation process included a review of relevant documents and a survey of stakeholders, which helped identify three target areas for the evaluation: Project Notification and Review System, Community Engagement and Partnerships, and Growing and Maintaining Local Capacity for the Coastal Program. A site visit was also conducted, and the evaluation team held meetings with staff members and group discussions with stakeholders and program staff members about the target areas. In addition, a public meeting was held on Wednesday, May 27, at 5:00 p.m. Samoa Standard Time at the North Wing of the Lee Auditorium in Utulei, American Samoa, to provide an opportunity for members of the public to express their opinions about the implementation of the program. Stakeholders and members of the public were also given the opportunity to provide written comments. A summary of the written comments received and the NOAA Office for Coastal Management's responses are included in Appendix A. NOAA then developed draft evaluation findings, which were provided to the coastal management program for review, and the program's comments were considered in drafting the final evaluation findings.

Final evaluation findings for all coastal management programs highlight the program's accomplishments in the target areas and include recommendations, which are of two types.

Necessary Actions address programmatic requirements of implementing regulations of the Coastal Zone Management Act and of the state coastal management program approved by NOAA. These must be carried out by the date specified. Failure to address necessary actions may result in a future finding of non-adherence and the invoking of interim sanctions, as specified in the Coastal Zone Management Act §312(c).

Recommendations are actions that the office believes would improve the program but which are not mandatory. The territory is expected to have considered the recommendations by the time of the next evaluation or dates specified.

Evaluation Findings

At the time of the evaluation site visit in May 2015 the American Samoa Coastal Management Program (coastal program) was housed under the Resource Management Division of the American Samoa Department of Commerce. In addition to the American Samoa Department of Commerce, the networked coastal management program in American Samoa also includes several other agencies that share responsibility as members of the Project Notification and Review System (PNRS) Board, and these agencies are the American Samoa Environmental Protection Agency, American Samoa Historic Preservation Office, American Samoa Power Authority, Department of Health, Department of Marine and Wildlife Resources, Department of Parks and Recreation, and Department of Public Works.

The backbone of the coastal program is its leadership role for the PNRS permitting system, including serving as chair for the PNRS Board, which reviews all land-use permit applications in American Samoa. For this reason, the evaluation focused in part on how the board was functioning under the coastal program's lead and how well the permit process was working. In addition, the evaluation sought to better understand the level and types of community engagement and partnerships employed by the coastal program to carry out its duties under the Coastal Zone Management Act. The third focus area for the evaluation aimed to work with the coastal program to find acceptable ways to grow and maintain local capacity to fully cover the staffing needs for the program now and into the future.

The evaluation team learned that a reorganization of the American Samoa Department of Commerce had been pending for some time before the site visit and could impact the coastal program's position within the department. It was noted during the evaluation meetings with program staff members that the imminent reorganization resulted in concern and uncertainty about the coastal program's fate. This concern impacted forward momentum on new initiatives that could bolster the program's important work on land use permits and coastal management. However, in August 2015 we learned that the reorganization was finalized and the coastal program manager was named the American Samoa Department of Commerce deputy director to lead the Resource Management Division, while retaining the coastal program manager position. This arrangement will provide the continuity in leadership that is needed at the coastal program but will also increase demands on the program manager to fulfill additional roles as the deputy director. Since the coastal program makes up the majority of the Resource Management Division of the American Samoa Department of Commerce, the roles are expected to be complementary. With the reorganization now complete, the American Samoa Coastal Management Program can continue its work to better manage American Samoa's coastal zone. The NOAA Office for Coastal Management will work with the coastal program to find ways to support its work during this time of transition.

Project Notification and Review System

Within the American Samoa Department of Commerce, one of the coastal program's main functions is to conduct the environmental review process for all land-use activities in American Samoa through the Project Notification and Review System (PNRS). As the chair of the PNRS Board, the American Samoa Department of Commerce is the lead agency for the networked coastal program in American Samoa, which includes eight different American Samoa government agencies. The PNRS Board consists of agency directors, or their designees, and meets in a public setting twice monthly, on the first and third Wednesdays, to review major land-use permit applications.

Coastal Program Administration and Technology

Since the last evaluation, the coastal program has made several improvements in the PNRS system. One improvement was combining the major and minor permit applications into a three-page form on 8.5" x 11" paper, which is reduced from the previous size of 8.5" x 14," streamlining the permit application. Recently, program staff members have begun working one-on-one with permit applicants to provide them with counseling throughout the permit process to ensure that they understand the information needed, and to build buy-in and trust with the public. Such buy-in is important for the coastal program to realize its verbally expressed vision to be "the place where people go for assistance on coastal issues." This increased level of customer service was popular with stakeholders and noted by the evaluation team.

In addition to the administrative improvements mentioned above, there have been some significant improvements using technology to better track permit applications, and any associated violations, through a new dashboard. The evaluation team learned that program staff members now use tablets, and an app is also under development to make geographic information systems (GIS) available on these tablets during routine site visits, which can help to streamline some of the permitting questions concerning site plans that are submitted by the applicants. The coastal program also offers to help applicants prepare a suitable site plan using LiDAR data, if needed. All these improvements are notable; however, since 2005, the largest improvement in technology is the development of the American Samoa GIS web portal, which has several features, including a land use portal (developed in 2009), a marine portal, a LiDAR portal, a hazards portal, a sea level rise and marsh migration viewer, and a crown of thorns seastar outbreak portal. The information hosted on the web portal makes the best available information accessible and supports management decisions in American Samoa. Notably, the GIS information supports agencies beyond the American Samoa Department of Commerce and provides a useful service to other parts of the American Samoan Government. Additionally, the American Samoa Community College has reached out to the GIS team at the coastal program for assistance because of a loss of GIS expertise at the college. The coastal program has also taken a leadership role with the GIS User's Group which continues to meet twice per year since it was established in 2001.

With the improvements in technology and data accessibility, the coastal program should consider looking for opportunities to pull together data in hand, such as GIS information, permit information, and historical information about each site or permit, to improve planning, consistency, and usability for the program, as well as for networked partner agencies. Also, enforcement violations are tracked by the coastal program, and with the newly available dashboard, program staff members can conduct an analysis of historical violations to improve education efforts in the areas with the most infractions. Other agencies do not have access to the enforcement citations and have expressed interest in accessing information on enforcement activities and permit status. With recent advancements, such as the dashboard, consolidated monitoring and tracking of permits can now occur and this functionality should be shared with PNRS partner agencies.

PNRS Board and Interagency Coordination

Information received during the evaluation site visit and through the stakeholder survey indicates that the coastal program has done a good job of regularly reaching a quorum (5 or more members of the PNRS Board present at PNRS Review meetings) in the past 1-2 years. This is an improvement over recent times and serves to increase the efficiency and effectiveness of the PNRS permitting system through better interagency coordination. However, PNRS Board members and stakeholders noted that there is only one agency director that regularly attends the PNRS Board meetings, and that the agency designees were not always well informed or well prepared for the meetings. This situation compelled one stakeholder to ask whether there is a qualification process to be a member or designee of the PNRS Board. Developing such qualifications may be an activity the coastal program could foster to improve participation in these meetings and ensure that the decisions on land-use permits are made by individuals with appropriate skills and knowledge of their respective agency's responsibilities towards the coastal program.

In the 2005 evaluation, it was noted that there was a lack of understanding within the American Samoa government about the coastal program. Specifically, the 2005 findings said, "While the functions and processes required by the ASCMP [coastal program] are being carried out, there is a lack of understanding that departments other than DOC [Department of Commerce] and the ASCMP [coastal program] are part of a network, and therefore are a functional part of the ASCMP [coastal program]." A similar situation was observed in 2015, and while the coastal program continues to do its part, there appears to be opportunities for some of the networked agencies to boost their understanding and participation in PNRS. It was clear that several PNRS Board members saw PNRS as the sole responsibility of the American Samoa Department of Commerce, suggesting that they should be compensated by the coastal program to participate in the PNRS review meetings and routine site visits that are a part of the permit review process. These site visits are generally not well attended and a complete team of all PNRS agencies is rare. (It was mentioned that only Department of Commerce, American Samoa Power Authority, and the Department of Marine and Wildlife Resources regularly attend site visits.) The site visits are an opportunity to allow the networked agencies to leverage the technical expertise that resides

across American Samoa's government agencies, and should be seen by the various agencies on the PNRS Board as an extension to their existing agency mandates. Members who do not attend the site visits can impact the efficiency of the permit review process by repeating questions at the board meetings that were already covered during the site visits. As was suggested in 2005, it would be worth the time for the PNRS Board to review the memorandum of agreements between the American Samoa Department of Commerce and the networked territorial agencies to reinforce the roles and responsibilities of each member agency.

Although there are regularly scheduled PNRS review meetings, these meetings do not allow for discussions beyond permit application reviews. The success of PNRS heavily relies on effective partnerships across the PNRS Board and therefore requires additional opportunities for the board to improve its process. In order to review the memorandum of agreements and enhance the functionality of PNRS, the PNRS Board members will need to set aside time to meet for non-public "executive sessions" on a regular basis to discuss topics concerning improving and enhancing the PNRS process. Topics for discussion could be around any memorandum of agreement updates or reaffirmations, gathering input from the networked agencies on ways to better facilitate the PNRS process, creating a new and more meaningful name for PNRS, and incorporating coastal hazards into PNRS considerations.

A particular challenge to the PNRS process is political pressure from higher levels of government or traditional leadership to pass a project when it should not be approved. The evaluation team heard about political and funding timeline pressures that can supersede the permitting process, and as a result the PNRS process has been seen as a "rubber stamp" since most applications are approved. Opportunities to address this issue included awareness, compliance, and formalization of the PNRS process to withstand political pressure. As politically appointed leaders, the directors of the networked agencies that make up the coastal program could use their position to educate legislators and the governor about the networked coastal program and its role in maintaining a balance between coastal protection and economic growth in order to support long-term sustainability of the coastal zone of American Samoa. For example, directors may educate leaders and decision-makers about setbacks and building codes and why these are important for protecting environmental resources, and then explain to them how the permitting process can be used to protect sensitive ecosystems while still allowing for development. Also, when a permit application needs to be signed by the landowner, usually a village chief, it is a good opportunity to educate traditional leaders about the issues or permit conditions contained in the permit application so they are aware of the impacts to their land. Once approved, any permit conditions associated with a permitted land-use activity ought to be shared with the village chiefs, as appropriate, to inform them about any concerns related to the activity so they can be involved with ensuring that the conditions are met. Finally, PNRS can strengthen its ability to withstand political pressure by seeking opportunities to further formalize and establish the permitting process through the development of stronger partnerships with member agencies, clarification of roles and responsibilities, and provision of meetings outside of the PNRS hearings to improve on the permitting process.

Permits and Enforcement

There was general consensus from stakeholders and partners that the process to obtain a land-use permit through PNRS is working and that the coastal program is doing a good job of running the PNRS permitting system. However, it was also clear that political and traditional issues were common obstacles, and the public needs to better understand why land-use permits are important to obtain from PNRS, even when the land is village owned. Also, feedback regarding enforcement of permit conditions and confusion about rules and regulations associated with PNRS permits indicates improvements are needed. The deputy director of the American Samoa Environmental Protection Agency said, “enforcement has an educational component,” and the coastal program is well positioned to augment its ongoing education and outreach efforts to better inform all stakeholders about the PNRS process and improve compliance rates. As previously noted, the coastal program stands in a unique position to work directly with political leaders through the membership of the PNRS Board, and with traditional leaders through the permit application process. This provides the opportunity to educate these two audiences about the ecological and economic importance of coastal areas, why these areas need special protection, why it benefits them and their villages, and how the PNRS permitting system incorporates these factors in determining permit approvals and special conditions.

In addition, feedback received from several members of the PNRS Board suggests permittees could also use some additional education from the coastal program when receiving an approved permit—especially regarding the permit conditions. American Samoa Environmental Protection Agency and American Samoa Power Authority representatives mentioned that fact sheets or informative brochures about permit conditions could be a useful educational tool that is provided and discussed during the one-on-one counseling service the coastal program gives to permit applicants when they pick up their approved permit. Also, it was pointed out that permittees need to know that they are required to have a copy of the full permit including any permit conditions on site, and that they communicate all the permit conditions to their contractors. Though there have been previous efforts to train and certify contractors, currently, one-on-one educational opportunities are only available to the permit applicants. The site visit revealed that it would be helpful for the coastal program to organize workshops for local contractors to increase their understanding of PNRS and the types of conditions they may find attached to permits for the jobs they are hired to do.

Generally, more proactive education for the PNRS permitting system is needed so that fewer “stop work” orders are issued and to reduce the number of “after the fact” permit applications received by PNRS after the construction activities have already been started or completed. While community outreach and engagement appears to be a strength of the coastal program under current leadership (more on this under Target Area 2: Community Engagement and Partnerships), the messaging could be honed to better illustrate the role of PNRS and why it is important to obtain land-use permits ahead of new construction projects in the territory. Ideally, education alone would be enough for 100 percent compliance with permit conditions and regulations. However, an approach involving education and incentives for using the PNRS process, as well as

increased enforcement, may be more likely to improve compliance issues that stem from village politics and land tenure entitlements that override conservation needs.

Regarding enforcement, wetlands violations and the lack of enforcement personnel on Tutuila and in the Manu'as were a concern mentioned by both program staff members and other stakeholders. Program staff members said that the PNRS Board is their "eyes and ears" since enforcement capacity is low, and for this to be effective, the board must understand its role in regulating coastal development activities. Additionally, some of the networked agencies have enforcement responsibilities, and the coastal program should consider facilitating joint enforcement efforts to leverage these existing enforcement capabilities. Such a collaborative and coordinated "enforcement team" from PNRS agencies might enhance participation across agencies at site visits and allow the enforcement sector to address common issues.

Overall, the coastal program is facilitating the PNRS permitting process adequately, and the volume of permits that get reviewed (about 50 per month) is an accomplishment in and of itself. However, the evaluation team felt that additional coordination could allow for the PNRS process to be conducted in a way that not only improves the thoroughness and coordination of permit reviews, but also provides benefits to its partner agencies as well as the public. The evaluation team recommends the development of a PNRS handbook to provide increased transparency to the permit review process, including establishing that PNRS is a crucial component of the American Samoa Coastal Management Program and that it is a multiagency responsibility. Language should also demonstrate the benefits of balancing environmental protection and economic development and why it is important that PNRS withstand political pressure.

The idea for developing a PNRS handbook stemmed from multiple suggestions from conversations with the program staff, PNRS Board members, and PNRS stakeholders, which individually were just small changes, but cumulatively could really improve the way that land-use permits in American Samoa are applied for and reviewed. In addition, many of the challenges described above, such as those related to compliance, coordination, and information sharing, can be improved through the development of a PNRS handbook. The suggestions included the following: provide a timeline for the permit process from start to finish (i.e., number of days for each step or a clarified process); standardize requirements for site plans (i.e. scale, layers, agency-specific criteria); provide definitions for "commercial" and "residential" and clarify how different types of structures fall into these categories (i.e., churches, fale, etc.); clarify regulations and permit conditions; clarify the roles and responsibilities of each board agency so applicants understand full scope to be considered during the review; provide each agency's checklist used to review permit applications to improve coordinated decision-making; and improve site visit coordination ensuring all pertinent members are present to increase efficiency of permit reviews.

Accomplishment: The American Samoa Coastal Management Program has developed technology-based solutions to significantly improve its permitting program. The development of the Project Notification and Review System dashboard, use of tablets by the staff, continued use and updates of GIS data to support decision-making for land-

use permit applications, and the development of the web portal have enabled staff members to make more informed decisions and improved the efficiency of the permitting program. In addition, the coastal program is able to provide up-to-date information to members of the Project Notification and Review System Board and other agencies.

Recommendation: The NOAA Office for Coastal Management recommends the American Samoa Coastal Management Program consider additional opportunities to collect, track, and share existing and new data streams across Project Notification and Review System agencies, and ensure that the data are in a usable format and the results incorporated into planning activities. In addition, the coastal program should work with its partner agencies to identify data and data analyses that the coastal program and the networked agencies could use to improve communication, efficiency, and efficacy of the Project Notification and Review System process for coastal management, specifically in the areas of project tracking, permit archiving, and GIS data—that is, analyzing permit citation data to identify major or common violations to better inform education and outreach efforts.

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2. Creating a Project Notification and Review System handbook that describes the benefits of having a permitting program, clearly lays out the permitting process and all requirements, and includes the comprehensive checklists from above. The handbook should be shared with Project Notification and Review System member agencies to improve coordinated decision-making, and be shared with the public to better assist applicants in understanding and navigating the Project Notification and Review System.

Community Engagement and Partnerships

Community Engagement

Over the past two to three years, the coastal program has really focused on community outreach. This timing coincides with the arrival of the current program manager, who feels that community engagement and outreach is a means of relationship building that allows for better leverage and collaboration with other agencies, and increased trust from the public. The public awareness coordinator position with the coastal program was vacant at the time of the site visit, and to fill the void, the current program manager has tasked all staff members with public outreach responsibilities. Over the past few years, the efforts to increase education and outreach have resulted in evaluation survey respondents indicating that these efforts were the program's biggest strength, and specifically calls out Coast Weeks as a top accomplishment. The Fautasi Coastal Challenge also received rave reviews, and the competitive spirit between villages has been harnessed for a good cause, allowing the villages to compete for monetary awards that go to village projects such as cleanups. This focus at the village level has been working to form good and important relationships and is necessary to gain buy-in from the villages for the coastal program's work through the PNRS permitting process. These relationships are critical for achieving the program's goal of becoming the place where people go for assistance on coastal issues, and since all of the territory is considered to be in the coastal zone, the program needs to continue to foster these relationships and grow its messaging to include all the villages in American Samoa.

The Office for Coastal Management understands that not all villages are the same and that challenges may exist in some more than others; however, it was noted that additional outreach efforts are needed in the east and west, since much of the current coastal outreach is focused in and around Pago Pago. A number of stakeholders felt that selecting good champions was important for the coastal program to gain traction in communities. As outreach efforts expand to

new places, the program may want to consider working through the Office of Samoan Affairs to identify the places with the most supportive high-ranking chiefs.

During the May 2015 site visit, the evaluation team was fortunate to be able to attend one of the coastal program's outreach events in Vatia Village. The church in the village hosted the outreach event one evening with great attendance from all ages within the village. The coastal program presented its outreach materials about wetlands, GIS, and PNRS. The Department of Homeland Security also participated and gave presentations on hazards, including tsunamis. The outreach event included breaking the attendees into smaller groups that circulated around stations where staff members spoke about the various outreach topics, and then tested their knowledge of these new topics with a fun "Family Feud" game. It was really impressive to see so many from the village commit their free time to learn about wetlands, GIS, and PNRS from the coastal program and hazards and tsunamis from Department of Homeland Security.

One reflection from the evaluation team was that there were some missed opportunities to tie the GIS and wetlands topics back to PNRS rules and regulations, such as building setbacks and considerations for development in wetland areas. Since PNRS is the backbone of the coastal program's mandate and is also where the program can most directly influence coastal resource impacts, the coastal program should consider making PNRS the common denominator for all outreach and illustrate how the different topics connect with land-use permits. This would provide members of the public with a more holistic view of the coastal program and understanding of why proposed activities in wetlands need special consideration when undergoing permit reviews. Following these lines, since resource management and climate change considerations are not currently areas built into the PNRS review process, the coastal program may want to consider proactively seeking out opportunities to learn more about these important issues. In the future, these topics ought to be added to the program's education and outreach efforts so those factors can be better understood by program staff members of partner agencies, PNRS Board members, and stakeholders. The goal of such efforts is to ensure that the program is including factors that promote resilience into the PNRS review process.

The evaluation team had the opportunity to talk with a community leader of Vatia village before the outreach event in Vatia began, and he had nothing but praise for the coastal program. As the reigning champion of the Fautasi Coastal Challenge from both 2013 and 2014, this community leader has become quite familiar with the program and said that he and his village get a lot of support from it. The people in the village have been increasingly involved with the cleanups in Vatia that were supported by the coastal program—so much so that in 2014 they ran out of gloves and bags during the cleanup because the whole village came out to participate, when in the previous year it was only the 40 person Fautasi team! Clearly Vatia has a great champion who is able to motivate others in the village to take actions that improve their coasts, and he wishes more villages worked in partnership with the coastal program, since there are lots of areas where the program can help villages with coastal issues, including coastal erosion. He has seen sea level rise impacts in his lifetime and increased beach erosion since the sea walls were put up to protect the roads. This is an example of how American Samoans are seeing impacts of climate change, and these experiences could be leveraged by education and outreach performed by the coastal

program to explain setback requirements and any anticipated changes to them based on sea level rise projections.

Partnerships

In addition to the important work done with the villages through education and outreach, the coastal program has many existing partnerships and participates on several multiagency boards in American Samoa, including Le Tausagi, the American Samoa Soil and Water District, Land-based Sources of Pollution Local Action Strategy working group, Climate Change Local Action Strategy working group, Coral Reef Advisory Group, etc. An outstanding example is the program's continued coordination of the American Samoa GIS User's Group. Established in 2001 by the GIS branch of the coastal program, the program has been involved with ensuring that this group meet semiannually and has become a clear leader for GIS services within the American Samoa Government. The evaluation team learned that recently the American Samoa Community College turned to the coastal program for support on GIS-related issues after losing its GIS expertise, which provides further evidence that the program is considered a leader in this field. The coastal program has been working closely with NOAA's Office for Coastal Management staff from the Honolulu office to acquire an enterprise license for GIS software that could expand the opportunity for even more coordination with additional entities in American Samoa. The coastal program is commended for its continued leadership on GIS in the territory and is encouraged to continue to build a strong GIS network in American Samoa.

During the site visit, the evaluation team heard that there are many meetings for the various groups in which the coastal program participates and that these meetings can take up a lot of time. The program ought to ensure that staff members are not overly burdened by participation and may look to these groups as a means to build capacity of junior staff members through their attendance and participation in these groups. Not only would that promote ownership among the staff on issues, but it would also expose more staff members to multiagency settings where they can learn about and build relationships with agency staff members performing complementary work. One group that was highlighted as having a lot of duplication with the coastal program is the Coral Reef Advisory Group (CRAG). Given that all of the territory is considered to be in the coastal zone, the coastal program has a lot of ground to cover between the ridgelines of the mountains in the interior and three miles out from the coast. In the tropics, the predominant coastal ecosystems are mangrove, wetlands, and coral reefs. These factors make the coastal program a great partner for any "ridge to reef" conservation efforts in American Samoa.

CRAG has a number of staff members that possess technical backgrounds, which is a capacity need for the coastal program. Through some joint planning efforts, the program could leverage CRAG's staff by developing some jointly funded projects using each program's federal funds to address issues of land-based sources of pollution, which is considered a key threat to coral reef ecosystems. Since both agencies sit on the Land-Based Sources of Pollution Local Action Strategy group, and the coastal program is a partner within the CRAG, this sort of joint effort in selected watersheds could produce a result greater than the sum of the individual efforts of the coastal

program and CRAG. Connectivity of terrestrial ecosystems, such as wetlands, to the coral reef ecosystem in the ocean is important, and they are intertwined—meaning that the health of the coral reefs and their associated fish assemblages depends on healthy functioning wetlands. Although these ecosystems are distinct and the coastal program plays an important role in wetlands, there should be a coordinated approach so that the coastal program is aware of and actively working in places where reefs are a management priority for the territory. These places provide an opportunity for meaningful partnership, and the program should seek out the opportunity to increase management efforts to reduce land-based sources of pollution and improve management in areas where wetlands are being removed or disturbed.

New Partnership Opportunities

Through the recent work on the 309 Assessment and Strategy for 2016-2020, a new emphasis on hazard mitigation has emerged, and the coastal program has begun working in greater partnership with the American Samoa Department of Homeland Security. With a focus on the five Fautasi Villages, education efforts are concentrated on tsunamis and the erosion issues concerning the building of seawalls. The Office for Coastal Management encourages the coastal program to strengthen the new partnership with the Department of Homeland Security through the development of a Hazards Mitigation Council and consideration of the department's role in the PNRS process. As previously mentioned, the coastal program needs to start incorporating climate change into future education and outreach efforts, and the hazards mitigation work could be a way to incorporate climate change into its educational repertoire.

Joint efforts in monitoring the territory's wetlands are being considered through the American Samoa Coastal Management Program's 2016-2020 Section 309 Assessment and Strategy. This presents a greater opportunity to partner with the American Samoa Environmental Protection Agency to work together on topics such as wetlands monitoring and updating the out-of-date 1983 wetlands delineations with the 2012 LiDAR data. Several times during the site visit, stakeholders expressed concern over the filling of wetlands and the lack of enforcement for this type of violation. Leone village was specifically named as an area in need of attention, and it is also home to the Leone Special Management Area. As one of the wetlands villages that the coastal program works with for outreach and wetlands programs, Leone would be a good village for an emphasis on education about wetlands and for increased research and monitoring in partnership with the American Samoa Environmental Protection Agency.

It was suggested during the evaluation site visit that a clearer definition for special management areas be developed so that the coastal program and other agencies could leverage this classification to increase work on the ground. Special management areas were also mentioned in the previous 312 evaluation as something that needs to be strengthened beyond designation through the development of policies, rules, and regulations.

Similar to CRAG, the American Samoa Environmental Protection Agency has technical expertise that the coastal program needs, and this expertise could be leveraged with jointly planned work in wetlands. Between the technical capacity at the Environmental Protection Agency and the

coastal program's regulatory powers through the PNRS permitting process, wetlands conservation could be more successful within the territory if these agencies partnered effectively. The Office for Coastal Management encourages the coastal program to move forward with a feasibility study to determine how best to establish a wetlands monitoring program in American Samoa as planned in the 2016-2020 309 Assessment and Strategy; perhaps this study could be jointly planned with the American Samoa Environmental Protection Agency. A benefit of performing regular monitoring of wetlands is that any violations of wetland regulations observed during monitoring activities could immediately be reported to the enforcement staff and enforcement actions undertaken. Additionally, monitoring the health and status of wetlands in American Samoa may provide a greater understanding of wetlands issues in the territory.

Through partnerships with the American Samoa Department of Homeland Security, American Samoa Environmental Protection Agency, CRAG, and other relevant agencies, the coastal program has the opportunity to leverage limited resources and strengthen the coastal program's ability to meet its mandates. The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to explore enhancing and formalizing partnerships with other agencies to better address issues of mutual concern, such as climate change, coastal hazards, and wetlands, to improve coastal resource management efforts.

Accomplishment: The American Samoa Coastal Management Program is successfully engaging with communities through outreach and education efforts such as the annual Coast Weeks events, the Fautasi Coastal Challenge, and village outreach events. The coastal program has built collaborative and important relationships at the village level and is responsible for organizing successful events to better educate the public about American Samoa's coasts and their programs, policies, and efforts.

Accomplishment: The NOAA Office for Coastal Management recognizes the American Samoa Coastal Management Program's leadership and coordination of an interagency GIS User's Group, which has resulted in the user group creating land use and marine web portals (portal.gis.doc.as) that support the Project Notification and Review System permitting process, as well as resource management efforts of partner agencies in American Samoa.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program build on its successful education and outreach efforts by making the Project Notification and Review System permitting process a central theme for all outreach, since the Project Notification and Review System continues to be the coastal program's most influential public interface driver with its legislative authority, mandates, and clear outcomes.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program lead the development of policies, rules, and regulations for the designated special management areas in American Samoa to allow for increased opportunities for leveraged work on the ground by relevant territorial and federal agencies.

Growing and Maintaining Local Capacity for the Coastal Program

Leadership

Since the last 312 evaluation in 2005, the leadership of the American Samoa Coastal Management Program has changed multiple times—the program manager position has seen six different people fill the role during the period between 2005 and 2012, when the current program manager was hired. Such turnover precludes the coastal program from developing long-term goals and the strategies needed for the program to attain those goals. After the recent reorganization of the American Samoa Department of Commerce, it is good news that the current program manager will remain with the coastal program to continue to grow the program and foster professional development of program staff members.

In 2012 when the current program manager came to the coastal program, the program went back to basics and focused primarily on the PNRS permitting program and building relationships necessary to grow. By scaling back to these core functions, the coastal program has been able to show success. Since 2012, there have been improvements in the PNRS Board reaching a quorum, and the success of the program's education and outreach efforts to communities is evident. With these recent improvements, now is the time for the coastal program to grow upon these successes, develop strategies, and execute a plan of action for the program to strive toward over the next few years. Some of these are already articulated in the new 309 Assessment and Strategy plan covering 2016-2020.

Coastal Program Staff

The current staff consists of both seasoned veterans with a wealth of institutional knowledge and fresh recruits eager to fulfill their duties with new perspectives. Under the leadership of the current program manager, the staff has been cross-training, which increases the effectiveness of the program as a whole. Staff members also more involved with project planning and reporting on the NOAA grant, thereby increasing ownership of their work and increasing the likelihood of successful completion of projects within the grant.

At the time of the evaluation, several key positions within the coastal program were vacant, many of which are technical positions that have been vacant for a long time, namely the environmental planner position. This is a historical issue for the program that was noted in two prior NOAA evaluations. NOAA commends the positive steps taken by the current program manager to begin to address this challenge and build long-term capacity for the program and is very supportive of the approach being taken to address staff capacity challenges. It's important to continue progress in this area, as the remaining vacancies impact the program's ability to meet its mandates and lead to the accumulation of unspent funds in the program's annual awards. Such practices increase burdens related to post-award action requests such as those related to no-cost extensions and changes in scopes of work. In addition, this makes it more difficult for the program to spend down funds in a timely manner and results in multiple open awards, thereby prolonging the reporting and grant administration needs for each award.

Existing staff members have expressed needs for additional technical training to better understand the science behind permitting conditions and access to professional development opportunities that better support advancement through the American Samoan Government human resources system. Staff members are eager and willing to build upon their existing skill sets, and the program manager is interested in fostering staff members to achieve their professional goals. These are all good starts that would benefit the coastal program. The coastal program should continue its work to fill the vacant senior technical positions with staff who meet the minimum educational and professional requirements of the position to provide the necessary technical expertise (e.g., GIS, wetlands science, environmental planning, etc.) and to serve as mentors to other appropriate staff members, such as the governor's apprentices.

NOAA supports the coastal program's long-term vision to build a strong territorial and regional capacity with a priority to hire from the local population. A long-term vision such as this will help ensure that improvements to capacity will be realized and sustained over time. In the short term, NOAA encourages the program to explore a wide pool of candidates to ensure it can fill the vacant technical positions. In order to better understand current capacities and the specific human resource needs required for the coastal program to function, the NOAA Office for Coastal Management will work with the coastal program to complete strategic planning exercises to identify long-term goals and short-term strategies, and incorporate what the coastal program is responsible for under the Coastal Zone Management Act to implement its federally approved coastal management program. These exercises will integrate goals and strategies identified in existing plans with additional opportunities currently being pursued through the 309 Assessment and Strategy 2016-2020 and other priority initiatives. Using these goals and strategies as a guide, NOAA will continue to work with the program to develop a list of capacity needs. By doing this capacity assessment, the minimum requirements can first be established, and then current and needed skill sets can be identified to meet these requirements. Finally, the coastal program can use these resources to build a forward-looking plan to fill senior positions with qualified staff and provide the additional training or mentoring needed to build skills over time and address any gaps in capacity.

The program should actively find partnerships to build capacity and strengthen leadership and technical skills of existing and incoming staff. NOAA encourages the program to leverage training brought to American Samoa with other agencies of the networked program, since locally available opportunities for certain topics may be lacking. The NOAA Office for Coastal Management offers a range of trainings that can be done locally as long as a minimum number of participants are enrolled. Additionally, CRAG mentioned that it was happy with recent weeklong intensive training programs brought to American Samoa. Such programs could be cost-shared across multiple agencies to bring down the cost to any one entity. PNRS Board members and the coastal program could benefit from attending trainings together on topics that directly pertain to better understanding the science around permit conditions and incorporating wetlands and climate change science into future permitting considerations.

The evaluation team heard that CRAG may have enforcement workshop opportunities available from time to time, and it was clear from discussions during the site visit that the local Sea Grant representative based at the American Samoa Community College was willing to work with the coastal program to increase dialogue and identify needed courses that could be brought to the community college. Increased partnership with the community college may be a key to developing local leaders for coastal management. Without a presence there, the students and future leaders will not know about coastal management as a career option, and to truly foster the next generation of resource managers, more awareness about coastal resource management is needed.

A summer internship or volunteering opportunity for students to shadow program staff members may also be a way to provide experience to students and should be considered. At one time, a very useful Sea Grant curriculum was offered through the University of Hawai'i that covered coastal management topics. Perhaps re-establishing that program, or one similar, but tailored to the results of the capacity assessment and current strategic documents, could address some of the educational requirements for building capacity of staff members. In addition, if such a curriculum were offered at the community college, students could learn about those concepts while interacting with coastal program staff members who were also enrolled in these classes. Finally, it was suggested that Land Grant may also be able to help with trainings to meet the coastal program's needs.

For any of these educational and training options to be effective, the coastal program and the American Samoa Department of Commerce will need to allow staff members time to attend classes, trainings, or exchanges. To grow and maintain local capacity, the program will need to provide staff members with opportunities for professional development—whether it's having staff members create independent development plans and then looking for opportunities to support them, or whether staff members are given the option to participate in the American Samoa Government's Executive Leadership Development Program, which is sponsored by the U.S. Department of the Interior. Unless these kinds of opportunities are extended to staff members, the coastal program will not likely be successful in meeting its capacity needs through internal means.

Accomplishment: The coastal program staff is commended for its long-standing dedication and hard work for the American Samoa Coastal Management Program. The veteran staff maintains a wealth of institutional knowledge and exemplifies the long-term dedication within the program, while new staff members are eager and bring fresh perspectives. All staff members have demonstrated their ability to fill gaps as needed, such as required for the implementation of the Coast Weeks and Fautasi Ocean Challenge programs. Staff members have also expressed ongoing interest in training opportunities to better perform their duties within the American Samoa Coastal Management Program.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program provide professional development opportunities to staff members to maintain and grow internal capacity. The coastal program should develop

partnerships with other agencies to leverage trainings brought to American Samoa and develop a presence at the American Samoa Community College to increase awareness of local students about career opportunities in resource management.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program develop a timeline and process for conducting a capacity assessment to identify current and needed skill sets that fulfill the long-term goals and near-term strategies of the coastal management program. The assessment should include an outline of priority capacity-building actions and a proposed timeline and process for implementing these actions. NOAA's Office for Coastal Management will provide technical assistance, as needed, to assist the program in completing the timeline for the capacity assessment.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program continue to provide a report on personnel and hiring status in the semiannual performance reports, including the status of all positions, how long any open position has been vacant, and efforts toward the filling of any open position.

Necessary Action: The American Samoa Coastal Management Program must fill positions in a timely manner and ensure positions are filled with candidates that meet the minimum requirements of the position description. In particular, the Program must fill vacant senior technical positions (e.g., Environmental Planner) to address a historical staffing gap within the program and provide the necessary mentorship, guidance, and training for existing staff and apprentices to achieve the program's long-term approach. The Program should document progress toward addressing this necessary action in the semi-annual performance reports and by providing the minimum requirements of any vacant senior technical positions.

Evaluation Metrics

Beginning in 2012, state coastal management programs began tracking their success in addressing three evaluation metrics specific to their programs. The evaluation metrics include a five-year target and provide a quantitative reference for each program about how well it is meeting the goals and objectives it has identified as important to the program.

METRIC 1

Goal: To improve wetlands management and protection at a village level

Objective: To use village-based wetland management plans and programs to raise local buy-in, support, and enforcement

Strategy: The American Samoa Coastal Management Program has divided its community-based wetlands programs into five stars of participation as follows:

- 1 Star: Outreach presentations to various levels of the community
- 2 Star: Wetlands delineation surveys and health assessments
- 3 Star: Enforceable wetland delineation agreements, Adopt-a-Wetland Program, restoration program
- 4 Star: Village management plan
- 5 Star: Regular monitoring and enforcement of the management plans

The American Samoa Coastal Management Program will use outreach efforts and research from Tier 1 and Tier 2 programs to educate the village on the value of their Tier 3 and 4 programs. The coastal program will also showcase those villages that have completed management plans to highlight the program and its benefits. On request from a participating village, coastal program will work with the village leadership to complete one of the chosen programs. While completion of a lower star project is not necessary for a village to request a full management plan, a full management plan will usually require some components of the other programs. For more information about the village-based management plan structure, please refer to the 2011 American Samoa 309 Assessment and Strategy.

Performance Measure: Number of villages that complete Tier 3 or Tier 4 wetland programs in partnership with the ASCMP, during the review period of 2012-2017.

Target: Four villages complete Tier 3 or Tier 4

Cumulative Results:

Number of villages with Tier 3 or 4 completed: **4** (Leone, Nu'uuli, Vatia, Aua)

Leone Village - Tier 3

(Nu'uuli Village-Coconut point) – Tier 3

Leone Village – Tier 4

Vatia Village – Tier 3 (Adopt a Coast)

Aua Village – Tier 3 (Adopt a Coast)

Discussion:

Since this metric was established in late 2012, the target of having four villages reach either Tier 3 or Tier 4 status has already been achieved. The Office for Coastal Management encourages the coastal program to continue with its efforts to develop village-based wetlands management plans with the other villages in which they are working by using the lessons learned from the process to develop a management plan for Leone Village.

Metric 2:

Goal: To assist and engage the traditional village institutions to better manage their own natural resources at a village level

Objective: To use village-based wetland management plans and programs to raise local buy-in, support, and enforcement

Strategy: The American Samoa Coastal Management Program has many tools that can be used by the public in conducting their own resource management projects. Often, simple outreach is enough to let people know that those tools are available. Villages can also benefit from training and assistance from the coastal program's expertise in doing their own management projects.

The coastal program will conduct outreach events aimed at encouraging village-based management projects. The program will provide training and workshops where necessary, and highlight the tools and products available to villages, such as the Land Use Web Portal. The coastal program will also use the Fautasi Ocean Challenge to get villages to compete in coastal management projects through the assistance of ASCMP.

Performance Measure: The number of outreach events conducted by The American Samoa Coastal Management Program dedicated to training, literacy, or management at the village level

Target: Five outreach events conducted by the coastal program dedicated to training, literacy, or management at the village level, per year

Annual Data:

2013: **3**

2014: **3**

2015: **6**

Cumulative Results: Number of outreach events conducted by ASCMP dedicated to training, literacy, or management at the village level between 10/1/2012 and 3/31/15: **12**

Outreach Workshops Conducted:

Village Councils of Vatia and Aua (2013): **2**

ASCMP Outreach Workshop at Office of Samoan Affairs (2013): **1**

Nu'uuli Poly Technical High School Science class (2014): **1**

Leone Junior High (2014): **1**

Tula Elementary School (2014): **1**

Samoana High School (2015): **2**
 Vatia Elementary School (2015): **1**
 Masefau Elementary School (2015): **1**
 Aoa Elementary School (2015): **1**
 Vatia Village Youth Group (2015): **1**

Discussion:

Since this metric was developed in late 2012, the coastal program has logged 12 outreach events dedicated to training, literacy, or management at the village level. In both 2013 and 2014, the target was missed by two events per year; however, in 2015 there were already six events at the time of the evaluation site visit in May 2015, which surpassed the annual target. The Office for Coastal Management encourages the coastal program to continue with its education and outreach events and to strive to identify strong leaders or champions in villages where they haven't already been involved and where coastal management issues are present.

Metric 3:

Goal: Improve compliance with Project Notification and Review System (PNRS) regulations within selected public and private stakeholder groups, especially those that regularly engage in activities that require PNRS permits

Objective: Ensure that identified members from selected public and private stakeholder groups receive the technical assistance they need to verify their knowledge of PNRS regulations

Strategy: The success of the PNRS depends upon the willingness of public and private stakeholders to seek and receive a permit before engaging in actions that require one. This willingness, in turn, requires stakeholders to be aware that permits are required and what materials are necessary, and to *acknowledge* that they are aware.

With this in mind, the American Samoa Coastal Management Program will

1. Use past records to identify public and private stakeholder groups disproportionately involved in activities that require PNRS approval;
2. With the help of the PNRS Board and agencies, design and implement training courses aimed at assuring that the selected stakeholder groups are aware of the permit requirements for activities they often engage in;
3. Include a "before and after" knowledge or awareness component into the training courses to measure improvement in acknowledged awareness of PNRS requirements;
4. Include a trainee "verification of awareness" signature as a requirement to receive a training completion certificate;
5. Advertise the availability of the new training course broadly using the networks of all PNRS agencies and private associations;
6. Encourage PNRS agencies to "lead by example" by sending appropriate staff people and primary contractors to undergo training and receive certificates; and
7. Begin offering the training to select pilot groups by summer 2013.

The American Samoa Coastal Management Program expects to increase the percentage of permit applicants who have successfully completed the PNRS training and have received training certificates with “verification of awareness” signatures throughout the five-year period from 0 to 25 percent by 2017. Since a majority of permit applications come from private residents, the 25 percent is expected to consist mostly of American Samoa government departments and permits applied for by the construction community.

Performance Measure: Percentage of PNRS permit applicants who have successfully completed PNRS training and received training certificates with “verification of awareness” signatures

Target: By 2017, 25 percent of PNRS permit applicants will have successfully completed PNRS training and received training certificates with “verification of awareness” signatures.

Cumulative Results: None – this metric has been altered from its original form.

Discussion:

It is the understanding of the evaluation team that the measure described above has been discontinued, and an approach to consult one-on-one with permit applicants has been used instead. While the one-on-one consulting has shown positive results, this measure needs to be updated officially through the Office for Coastal Management and include proper updates to all of the aspects to this measure, including the goal, objective, strategy, performance measure, and target. To make these updates, please work with the NOAA site liaison, Hideyo Hattori, and lead 312 evaluator, Carrie Hall.

Additionally, the feedback received during the site visits indicates that the PNRS trainings and associated certificates for local contractors may still be needed (see page 9).

Conclusion

For the reasons stated herein, I find that the Territory of American Samoa is adhering to the programmatic requirements of the Coastal Zone Management Act (CZMA) and its implementing regulations in the operation of its approved American Samoa Coastal Management Program.

The necessary action described in these findings must be addressed to the satisfaction of NOAA's Office for Coastal Management. Failure to successfully address this necessary action may result in a future finding of non-adherence and the invoking of interim sanctions, as specified in CZMA §312(c). The Office for Coastal Management will consider the findings in this evaluation document when making future financial award decisions concerning the American Samoa Coastal Management Program. These evaluation findings also contain nine recommendations that must be considered before the next regularly scheduled program evaluation but which are not mandatory at this time. Recommendations that must be repeated in subsequent evaluations may be elevated to necessary actions.

This is a programmatic evaluation of the American Samoa Coastal Management Program that may have implications regarding the territory's financial assistance awards. However, it does not make any judgment about or replace any financial audits.



Jeffery L. Payne, Ph.D.
Director
NOAA Office for Coastal Management



Date

Appendix A: Response to Written Comments

No comments were received.

Appendix B: Table of Recommendations and Necessary Actions

The following table was developed to assist the coastal program in tracking and reporting on recommendations and necessary actions, particularly in the performance progress report.

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
Project Notification and Review System	<p>Recommendation: The NOAA Office for Coastal Management recommends the American Samoa Coastal Management Program consider additional opportunities to collect, track, and share existing and new data streams across Project Notification and Review System agencies, and ensure that the data are in a usable format and the results incorporated into planning activities. In addition, the coastal program should work with its partner agencies to identify data and data analyses that the coastal program and the networked agencies could use to improve communication, efficiency, and efficacy of the Project Notification and Review System process for coastal management, specifically in the areas of project tracking, permit archiving, and GIS data—that is, analyzing permit citation data to identify major or common violations to better inform education and outreach efforts.</p>			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
Project Notification and Review System	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve coordination of the networked coastal management program agencies and implementation of the permitting program by implementing the following:</p> <ol style="list-style-type: none"> 1. The American Samoa Department of Commerce and the networked agency partners of the American Samoa Coastal Management Program should review and update the existing memorandum of agreements that guide implementation of the coastal management program. The review should ensure that all agencies still agree to their roles and responsibilities in implementing the federally approved coastal program and reaffirm the commitments therein with Project Notification and Review System Board members, and update memorandums of agreement as needed. If changes to the agreements are determined to be needed, revisions should be submitted as a program change to the NOAA Office for Coastal Management. 2. The American Samoa Coastal Management Program and Permit Notification and Review System Board should meet semiannually outside of the regularly scheduled board meeting to identify improvements to be implemented and to evaluate the results of any improvements to the permitting process. 			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
Project Notification and Review System	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve Project Notification and Review System enforcement efforts, especially in wetlands areas. The coastal program should analyze enforcement needs and develop strategies that meet the identified needs. The development of strategies should include consideration of opportunities to better leverage existing enforcement capacity across Project Notification and Review System partners.</p>			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
Project Notification and Review System	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program improve the implementation of the permitting process and transparency by</p> <ol style="list-style-type: none"> 1. Developing a comprehensive checklist for each Project Notification and Review System member agency, if one doesn't already exist, to document each step that needs to be completed to ensure a full review of a permit application before the application goes to the Project Notification and Review System Board for a vote. 2. Creating a Project Notification and Review System handbook that describes the benefits of having a permitting program, clearly lays out the permitting process and all requirements, and includes the comprehensive checklists from above. The handbook should be shared with Project Notification and Review System member agencies to improve coordinated decision-making, and be shared with the public to better assist applicants in understanding and navigating the Project Notification and Review System. 			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
Community Engagement and Partnerships	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program build on its successful education and outreach efforts by making the Project Notification and Review System permitting process a central theme for all outreach, since the Project Notification and Review System continues to be the coastal program’s most influential public interface driver with its legislative authority, mandates, and clear outcomes.</p>			
Community Engagement and Partnerships	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program lead the development of policies, rules, and regulations for the designated special management areas in American Samoa to allow for increased opportunities for leveraged work on the ground by relevant territorial and federal agencies.</p>			
Growing and maintaining local capacity for the coastal program	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program provide professional development opportunities to staff members to maintain and grow internal capacity. The coastal program should develop partnerships with other agencies to leverage trainings brought to American Samoa and develop a presence at the American Samoa Community College to increase awareness of local students about career opportunities in resource management.</p>			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
<p>Growing and maintaining local capacity for the coastal program</p>	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program develop a timeline and process for conducting a capacity assessment to identify current and needed skill sets that fulfill the long-term goals and near-term strategies of the coastal management program. The assessment should include an outline of priority capacity-building actions and a proposed timeline and process for implementing these actions. NOAA’s Office for Coastal Management will provide technical assistance, as needed, to assist the program in completing the timeline and process for the capacity assessment.</p>			
<p>Growing and maintaining local capacity for the coastal program</p>	<p>Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program continue to provide a report on personnel and hiring status in the semiannual performance reports, including the status of all positions, how long any open position has been vacant, and efforts toward the filling of any open position.</p>			
<p>Growing and maintaining local capacity for the coastal program</p>	<p>Necessary Action: The American Samoa Coastal Management Program must fill positions in a timely manner and ensure positions are filled with candidates that meet the minimum requirements of the position description. In particular, the Program must fill vacant senior technical positions (e.g., the Environmental Planner) to address a historical staffing gap within the program and provide the necessary mentorship, guidance, and training for existing staff and apprentices to</p>			

Target Area	Recommendation or Necessary Action	Deadline(s)	Status* and Accomplishments	Next Steps
	achieve the program’s long-term approach. The Program should document progress toward addressing this necessary action in the semi-annual performance reports and by providing the minimum requirements of any vacant senior technical positions.			

*Status of completion must be reported as either “not started,” “in progress,” “not on schedule,” or “completed” (including date of completion). If status is either “not started” or “not on schedule,” please include an explanation and plans to address requirements.