

Final Evaluation Findings

American Samoa Coastal Management Program

May 2015 to February 2023

Published June 2024



Office for Coastal Management
National Ocean Service
National Oceanic and Atmospheric Administration
United States Department of Commerce

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Summary of Findings

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 May 2015 to February 2023. The evaluation concentrated on three focus areas: the Project Notification and Review System, Geographic Information Systems, and Wetlands Protection Outreach and Education.

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 taken on a new role as principal contact for the interagency implementation of the American Samoa Hazard Mitigation Plan.

Accomplishment: The American Samoa Coastal Management Program has provided training and information to increase both agency understanding and public knowledge of the consolidated permitting system to ensure higher levels of compliance with program regulations.

Accomplishment: The American Samoa Coastal Management Program has successfully developed and launched a web-based application system.

Accomplishment: The American Samoa Coastal Management Program has increased enforcement capabilities by creating a full-time enforcement position.

Accomplishment: The American Samoa Coastal Management Program has developed a geographic information system that provides needed information to a variety of government agencies to increase their efficiency and effectiveness.

Accomplishment: The American Samoa Coastal Management Program has created a successful training initiative to achieve and maintain a high standard of expertise for program staff.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to provide training for all government agency employees responsible for land disturbing activities to ensure that land use regulations are not violated during the course of agency activities.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Department of Commerce to analyze coastal management program staff workloads to ensure that permitting activities are both efficient and effective.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program continue to work with the legislature to increase fines for violations, including failure to obtain a permit prior to beginning a development project.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to continue to build on the public outreach materials and activities designed to instill a wetlands protection ethic.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to continue to take advantage of fellowships and training opportunities and to track the retention success of these programs in helping to maintain a highly qualified staff

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 2023. The evaluation team consisted of Ralph Cantral, evaluation team lead; Jean Tanimoto, Pacific region director; Marie Auyong, Guam coral/coastal management liaison, and Jewel Tuiasosopo American Samoa coral/coastal management liaison, all from the NOAA Office for Coastal Management. 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 Petti T. Matila, Director, American Samoa Department of Commerce, published a notice of “Intent to Evaluate” in the *Federal Register* on April 30, 2019, and notified American Samoa’s congressional delegate. The coastal management program posted a notice of the public meeting and opportunity to comment in the *Samoa News* on February 10, 17, and 24, 2023.

The evaluation process included a review of relevant documents and a survey of stakeholders, which helped identify three focus areas for the evaluation: Project Notification and Review System, Geographic Information Systems, and Wetlands Protection Outreach and Education. A site visit was conducted and the evaluation team held meetings with staff members and group discussions with stakeholders and program staff members about the focus areas. In addition, a public meeting was held on Tuesday, February 28, 2023, at 9:00 a.m. Samoa Standard Time at the Governor H. Rex Lee Auditorium, Utulei, American Samoa 96799 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. No written comments were received. NOAA then developed draft evaluation findings, which were provided to the American Samoa Department of Commerce for review, and the department’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 the Coastal Zone Management Act or its implementing regulations at 15 C.F.R., Part 923, and of the state coastal management program approved by NOAA, and the terms of any grant or cooperative agreement funded under the Coastal Zone Management Act. Necessary actions 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 state is expected to have considered the recommendations by the time of the next evaluation or dates specified.

Evaluation Findings

The American Samoa Coastal Management Program is a networked program led by the American Samoa Department of Commerce. The other agencies with responsibilities in administering the program are the American Samoa Environmental Protection Agency, Historic Preservation Office, Power Authority, Department of Health, Department of Marine and Wildlife Resources, Department of Parks and Recreation, and Department of Public Works. The leaders of these agencies form the board for the Project Notification and Review System, which reviews all applications for land use changes in American Samoa.

Since the prior evaluation in 2015, several key events have influenced both the methods of work and policy priorities in the territory. In 2018, Cyclone Gita struck the islands causing significant damage, and debris from the disaster had serious impacts on structures throughout the islands; more than 800 people were displaced from their homes, and 90 percent of the residents of the island of Tutuila were left without power. In addition, debris was washed into many wetland areas. All of these events had a significant impact on the coastal management program's ability to serve the public.

Following Cyclone Gita, coastal management program staff supported disaster recovery efforts at the American Samoa Department of Homeland Security for more than seven months. These staff participated in damage assessment in the field, as well as providing key mapping assistance to other agencies and general assistance to residents who had suffered property damage. To augment existing staff, the program hired a coastal hazards mitigation plan coordinator to serve as the principal point of contact on the implementation of the American Samoa Hazard Mitigation Plan. The coordination role has become increasingly important for the program.

Accomplishment: The American Samoa Coastal Management Program has taken on a new role as principal contact for the interagency implementation of the American Samoa Hazard Mitigation Plan.

In 2019, a public health emergency was declared and quarantine placed in effect due to the potential for a measles outbreak, increasing the difficulty of implementing the program. And in 2020, the COVID-19 pandemic placed further restrictions on work life for the American Samoa government, including the coastal management program staff.

Project Notification and Review System

All development projects in American Samoa must be reviewed by the Project Notification and Review System Board. The board is composed of members of the networked agencies that have regulatory authority over the coastal zone. The evaluation team observed a meeting of the Project Notification and Review System Board during the site visit in February 2023 and was

able to observe how both members of the public and governmental agencies could bring projects for technical review.

As recommended in the 2016 evaluation findings, the coastal management program staff have developed training programs for new members of the board. One of the key elements of the training is to review both the requirements and the appropriate procedures for issuing permits. These requirements are also included in a handbook that has proven useful to guide the board members in their decision-making. Board members have also adopted the handbook in the training of new staff members in their agencies and programs, making it a valuable tool for the entire American Samoa government.

During the evaluation period, the coastal management staff have also taken steps to better educate residents about the fragile nature of the island resources and to explain why the permitting programs are necessary. Brochures explaining the importance of the coastal program special management areas and the requirements of the Permit Notification and Review System have been prepared in both English and Samoan and are distributed to both permit applicants and the general public at community meetings.

Accomplishment: The American Samoa Coastal Management Program has provided training and information to increase both agency understanding and public knowledge of the consolidated permitting system to ensure higher levels of compliance with program regulations.

Unfortunately, the evaluation team also learned that government agencies have had violations related to projects and have had to appear before the Project Notification and Review System Board to seek after-the-fact permits. The reasons for the violations seem to be related to workers in the field not being familiar with the regulations. Although the agencies seem to be providing some training related to the Project Notification and Review System, trainings from coastal program staff might be more effective.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to provide training for all government agency employees responsible for land disturbing activities to ensure that land use regulations are not violated during the course of agency activities.

One of the most significant changes during this evaluation period was the switch from paper-based permit applications to a web application process. This has not only made the application process easier for the public, it has also enabled the program staff to better monitor permits, digitize site visit reports, and log violations in a GIS-based format.

Accomplishment: The American Samoa Coastal Management Program has successfully developed and launched a web-based application system.

The coastal management program has seen an increase in the number of development permits being sought in recent years. The influx of federal funding for various territorial programs, including recovery activities after Cyclone Gita was one of the causes, and funding related to the Bipartisan Infrastructure Law and the Inflation Reduction Act may also contribute to a greater permitting workload now and in the future. This increase has been taxing on the staff, especially in light of special assignments to assist other agencies, such as the long-term response to Cyclone Gita.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Department of Commerce to analyze coastal management program staff workloads to ensure that permitting activities are both efficient and effective.

Unfortunately, the program has also seen an increase in the number of violations of the program regulations. Although part of this increase can be attributed to having better surveillance, the program feels that this may also be related to not having a sufficient deterrent for improper development. At this time, the maximum penalty is a civil fine of \$100. In some instances, violators have seen the civil fine as a low-cost way of doing business, as this is a minimal fine and is not recurring. The program is working with the American Samoa Legislature to eliminate this loophole by both increasing the maximum fine and creating the possibility of the fines being recurring if the issue is not addressed in a timely manner.

Recommendation: The NOAA Office for Coastal Management recommends that the American Samoa Coastal Management Program continue to work with the legislature to increase fines for violations, including failure to obtain a permit prior to beginning a development project.

The 2016 evaluation findings included a recommendation related to increasing the program's enforcement capabilities. In response, the Department of Commerce created a new full-time enforcement position. This new position has helped a great deal in freeing up the time of permitting officers. It also has led to better coordination with the other agencies in identifying potential violations for coastal management staff to investigate.

Accomplishment: The American Samoa Coastal Management Program has increased enforcement capabilities by creating a full-time enforcement position.

Geographic Information Systems

The Project Notification and Review System and the geographic information system are so closely linked that the evaluation team decided to address them together, rather than as separate focus areas.

One of the most visible and valuable roles for American Samoa Coastal Management Program staff is the provision of geographic information and mapping. The coastal program provides mapping services for agencies throughout the American Samoa government. To facilitate the provision of services, the program staff have created a GIS user group. The user group consists

of representatives of 13 government agencies that identify needs and develop strategies to deliver needed services. This system proved invaluable in the response and recovery efforts for Cyclone Gita in 2018.

As mentioned above, the geographic information system has been a key element in the success of the implementation of the Permit Notification and Review System, as it has allowed the mapping of permits, violations, and site visit reports into a central database that can be accessed by staff online and while in the field. The system has been so successful that it received a major international award from the software provider.

Accomplishment: The American Samoa Coastal Management Program has developed a geographic information system that provides needed information to a variety of government agencies to increase their efficiency and effectiveness.

Wetlands Protection Outreach and Education

Wetlands protection and restoration has been a high priority for the American Samoa Coastal Management Program throughout this evaluation period. In the most recent Section 309 assessment, wetlands were found to be the number one concern among stakeholders due to the continuing impacts of sea level rise and coastal storms. The stakeholders were concerned about three wetlands benefits to the community: protecting properties from coastal storms, helping to improve water quality, and providing habitat for fisheries and wildlife. A multiagency wetlands monitoring committee was established in 2017 to help implement a monitoring program developed under strategies from the 2011 Section 309 assessment.

Wetland loss in American Samoa can be attributed to several factors, including long-term stressors such as sea level rise and periodic events such as coastal storms. Cyclone Gita, in 2018, deposited a large quantity of debris into the wetlands. In response, the coastal program staff conducted an assessment of all 11 wetland areas on the island of Tutuila. As part of this assessment, drones were used to provide aerial data to establish a baseline. The drone information was key to identifying potential hotspots of wetland destruction, but unfortunately, there has to date been no detailed mapping of wetlands that aligns with territorial or federal jurisdictions. The coastal management program is currently working to better delineate the jurisdictional boundaries using soils, vegetation, and hydrology criteria. The program is coordinating closely with the U.S. Army Corps of Engineers on these efforts.

Although natural factors such as storm events can cause significant damage, other continuing problems such as trash disposal and illegal and unpermitted filling have significant impacts on the wetland resources. The coastal management program holds annual coastal cleanups that enlist volunteers to help clean up the coast and, in particular, coastal wetlands. These cleanups have recovered many tons of trash and also serve as an educational tool for the community, teaching about the importance of having vibrant wetlands. Once the jurisdictional wetlands are effectively delineated, a major task for the coastal management program will be to develop outreach materials to educate community members, potential developers, and other agencies

that undertake land disturbing activities about how they can use best management practices to protect the wetlands.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to continue to build on the public outreach materials and activities designed to instill a wetlands protection ethic.

General Program Implementation

In the prior findings in 2016, the American Samoa Coastal Management Program received a necessary action related to staffing.

2016 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.

The American Samoa Coastal Management Program has made great strides in growing and maintaining local capacity in the program, something that not only ensures a higher level of acceptance by local people, but also provides high quality jobs for local residents. This has been made possible by a focus on bringing in staff in lower-level jobs and providing them with training opportunities to enable them to qualify for professional-level positions. Ongoing training efforts are focused in the areas of floodplain management, wetlands delineation, and geographic information systems and are conducted in several ways: in-house training with senior staff; professional conferences; and in-person and online trainings. As of the time of this evaluation, it was unclear whether these efforts would be successful in building a long-term pipeline for ensuring a highly qualified workforce.

Accomplishment: The American Samoa Coastal Management Program has created a successful training initiative to achieve and maintain a high standard of expertise for program staff.

Recommendation: The NOAA Office for Coastal Management encourages the American Samoa Coastal Management Program to continue to take advantage of fellowships and training opportunities and to track the retention success of these programs in helping to maintain a highly qualified staff.

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. In 2018, coastal programs began a new five-year period and set targets specific to their programs for two performance measures from the existing Coastal Zone Management Performance Measurement System and the coastal hazards performance measure.

Evaluation Metrics: 2012-2017

Metric 1: Wetlands

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: ASCMP has divided its community based wetlands programs into four stars of participation, as follows:

Tier 1: Outreach presentations to various level of community.

Tier 2: Wetlands delineation surveys and health assessments.

Tier 3: Enforceable wetland delineation agreements, Adopt-a-Wetland Program, restoration project.

Tier 4: Village management plan.

ASCMP will use outreach efforts and research from Tier 1 and Tier 2 programs to educate the village on the value of the Tier 3 and 4 programs. ASCMP will also showcase those villages that have completed management plans to highlight the program and its benefits. On request from a participating village, ASCMP 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 2012-2017.

Target: Four villages complete Tier 3 or Tier 4 wetland programs in partnership with ASCMP, during the review period 2012-2017.

Results:

- Year 1: 3
- Year 2: 2
- Year 3: 1
- Year 4: 5

Year 5: 0

Total: 11

Discussion: The American Samoa Coastal Management Program exceeded the goal by working with 11 communities to develop wetlands programs.

Metric 2: Outreach

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: ASCMP 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 ASCMP’s expertise in doing their own management projects.

ASCMP will conduct outreach events aimed at encouraging village-based management projects. ASCMP will provide training and workshops where necessary, and highlight the tools and products available to villages, such as the Land Use Web Portal. ASCMP 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 ASCMP dedicated to training, literacy, or management at the village level.

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

Results:

- Year 1: 3
- Year 2: 3
- Year 3: 13
- Year 4: 8
- Year 5: 2

Total: 5.8 per year

Discussion: The American Samoa Coastal Management Program exceeded the overall target for the performance measure during this period, but was not consistent in meeting the annual target for village outreach events.

Metric 3: Project Notification Review System

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

Objective: Assure 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 Permit Notification and Review System 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, what materials are necessary, and to acknowledge that they are aware.

With this in mind, ASCMP will:

1. Use past records to identify public and private stakeholder groups disproportionately involved in activities which 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/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.
7. Begin offering the training to select pilot groups by summer 2013.

ASCMP expects to increase the percentage of permit applicants that have successfully completed the PNRS training and received training certificates with "verification of awareness" signatures throughout the five-year period from 0 to 25% by 2017. Since a majority of permit applications come from private residents, the 25% 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% of PNRS permit applicants will have successfully completed PNRS training and received training certificates with "verification of awareness" signatures.

Results:

Year 1:	0
Year 2:	41%
Year 3:	N/A
Year 4:	N/A
Year 5:	N/A

Total: 11

Discussion: This measure was found to be not a good measure for the program and was replaced with another indicator in the next round of measures.

Evaluation Metrics: 2018-2023

Metric 1: Coastal Hazards – Hazards Mapping

Goal: To minimize the loss of life and property caused by improper development in areas likely to be affected by or vulnerable to coastal hazards.

Objective: By 2023, three projects including the coastal hazards mapping project and monitoring coastline change are completed.

Strategy: To achieve our goal, ASCMP will implement the following projects to assist with conducting environmental review of land use activities to include development review, analysis, compliance, etc. The following projects will provide important geographic data pertaining to ASCMP's enforceable policies (such as wetlands and setbacks, flood zones, streams, etc.) for use in review of construction.

1. ASCMP will produce a new building footprint GIS layer from a 2012 Aerial Imagery and Light Detection and Ranging (LiDAR) to improve decision-making in the land use permitting system for greater coastal resilience. This project will leverage external sources to include natural hazard datasets developed by the University of Hawaii, NOAA OCM Pacific Islands office and other organizations. ASCMP will also seek permission to include the tsunami data in addition to the sea level rise data in possession. This project was drawn from the American Samoa Section 309 Assessment and Strategy.
2. ASCMP will also launch and host an ArcGIS Online Mapping: Hazard Mitigation and Coastal Resiliency portal to include tools, widgets, and features to view, analyse and disseminate data pertaining to natural hazards.
3. ASCMP will complete the FY18 PSM titled *Monitoring Coastline Change to Evaluate the Effectiveness of Current Policies to Improve Decision Making for Greater Coastal Resilience*. ASCMP will contract a certified FAA drone service provider to assist ASCMP in conducting an environmental analysis utilizing Small Unmanned Aerial Systems (sUAS) to measure and monitor the impacts of sea level rise in wetlands and special management areas most vulnerable to coastal hazards and visibly noticeable coastal erosion.

During the five-year reporting cycle, ASCMP anticipates developing a) zero (0) state-level policies and plans developed or updated; b) zero (0) local-level policies and plans developed or updated; c) three (3) projects completed at the state-level; and d) zero (0) projects completed at the local level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Performance Measure: Between 2018-2023, number of a) state-level policies and plans developed or updated; b) local-level policies and plans developed or updated; c) projects completed at the state-level; and d) projects completed at the local level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Target: Between 2018 and 2023, three a) state-level policies and plans developed or updated; b) local-level policies and plans developed or updated; c) projects completed at the state-level; and d) projects completed at the local level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Results: Year 1: 0
Year 2: 0
Year 3: 0
Year 4: 0
Year 5: N/A

Total:

Discussion: The activities specified in this strategy were completed, but did not lead to policy changes at the state or local level.

Metric 2: Coastal Hazards – Hazard Mitigation Planning

Goal: To minimize the loss of life and property caused by improper development in areas likely to be affected by or vulnerable to coastal hazards.

Objective: By 2023, the coastal hazards mapping and education project listed as Project #15 in the American Samoa Hazard Mitigation Plan is complete. This project has three components to include (1) data assessment and development, (2) ArcGIS Online Mapping Hazard Mitigation and Coastal Resiliency viewer, and (3) education, outreach, and training. Additional detailed information regarding the coastal hazards mapping and education projects can be found at <http://doc.as.gov/resource-management/ascmp/2015-hazard-mitigation-plan-2/>.

Strategy: ASCMP will provide ArcGIS training to government agencies and departments on the use of the American Samoa Hazard Mitigation and Coastal Resiliency Viewer to be developed in the Coastal Hazard metric above.

Performance Measure: Between 2018 and 2023, number of training events related to coastal hazards by the CZM Program.

Target: Between 2018 and 2023, 10 training events related to coastal hazards will be conducted by the CZM Program.

Results: Year 1: 0
Year 2: 0
Year 3: 0
Year 4: 0
Year 5: N/A

Total: 0

Discussion: The American Samoa Coastal Management Program was unable to meet this goal, partially due to the COVID-19 pandemic restrictions on in-person meetings.

Metric 3 – Land Use Permitting

Goal: Improve compliance with Project Notification and Review System (PNRS) regulations within selected public and private stakeholder groups.

Objective: By 2019, increase numbers of stakeholder groups receiving the technical assistance they need to verify their knowledge of PNRS regulations.

Strategy: The success of the Permit Notification and Review System 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, what materials are necessary, and to *acknowledge* that they are aware.

With this in mind, ASCMP will:

1. Use past records to identify public and private stakeholder groups disproportionately involved in activities, which 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/awareness component into the training courses to measure improvement in acknowledged awareness of PNRS requirements.
4. Advertise the availability of the new training course broadly using the networks of all PNRS agencies and private associations.
5. Encourage PNRS agencies to “lead by example” by sending appropriate staff people and primary contractors to undergo training and receive certificates.
6. Begin offering the training to select pilot groups by summer 2019.

Performance Measure: Between 2018 and 2023, the number of training events related to Coastal Dependent Uses and Community Development and Government Coordination offered by the CZM Program.

Target: Between 2018 and 2013, 20 training events related to Coastal Dependent Uses and Community Development and Government Coordination offered by the CZM Program.

Results:

Year 1:	3
Year 2:	1
Year 3:	2
Year 4:	2
Year 5:	N/A

Total: 8

Discussion: The American Samoa Coastal Management Program was unable to meet this goal, partially due to the COVID-19 pandemic restrictions on in-person meetings.

Conclusion

This evaluation concludes that the American Samoa Department of Commerce 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.

These evaluation findings contain five recommendations that must be considered before the next regularly scheduled program evaluation but that 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, which may have implications regarding the territory's financial assistance awards. However, it does not make any judgment about or replace any financial audits.

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

Date

Appendix A: Response to Written Comments

No written comments were received.