

Evaluation Findings

Commonwealth of the Northern Mariana Islands
Coastal Management Program

September 2014 to October 2019

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Executive Summary

The Coastal Zone Management Act requires the National Oceanic and Atmospheric Administration's Office for Coastal Management 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 Commonwealth of the Northern Mariana Islands (CNMI) Coastal Management Program by the CNMI Bureau of Environmental and Coastal Quality Division of Coastal Resources Management for the period from September 2014 to October 2019. The evaluation focused on three target areas: staff training and retention, interagency collaboration and communication, and tourism development pressures.

The findings in this evaluation document will be considered by the NOAA Office for Coastal Management in making future financial award decisions concerning the coastal program. The evaluation came to these conclusions:

Accomplishment: The Division of Coastal Resources Management has succeeded in building a staff composed largely of qualified local residents.

Accomplishment: The Division of Coastal Resources Management has joined with Northern Marianas College to create internship opportunities for local residents to gain employment in natural resource management agencies.

Accomplishment: Instituting a series of improvements to the permitting process since the prior evaluation has led to agency reviews that are more thorough as well as faster turnaround times for applicants.

Accomplishment: The Division of Coastal Resources Management has developed ongoing partnerships with other agencies and nongovernmental organizations to reduce costs and increase coastal program presence in the community.

Accomplishment: The Division of Coastal Resources Management has developed innovative programs and interagency partnerships to understand and address the impacts of tourism on coastal and ocean resources.

Recommendation: The Division of Coastal Resources Management should continue to support internship assignments in other agencies and work with the Office of Planning and Development to establish interagency training and job shadowing to ensure technical capacity that can withstand staffing changes within the agencies.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management require all staff members to develop individual development

plans and appoint a staff member to coordinate training opportunities. Such plans could support improved job performance, maintain staff morale, and help avoid unnecessary changes to cooperative agreements.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management leadership meet with section leads and their backups to review each cooperative agreement in its entirety, including all special award conditions, after proposals have been approved by NOAA.

Recommendation: The Division of Coastal Resources Management should identify the authorities who could lift the austerity restrictions and work with the federal program officer and the NOAA Office for Coastal Management leadership to remove the imposition of austerity measures on federally funded employees to ensure that the program is being implemented effectively.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management work with the CNMI Office of Planning and Development to ensure coordination with network agencies in implementation of federally funded projects.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management continue outreach within the tourism community to be seen as the primary contact for coastal planning wants and needs.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management work with the CNMI Office of Planning and Development in coordination with NOAA to develop a process for compiling and disseminating public and private grant opportunities to the relevant tourism associations and partner agencies.

This evaluation concludes that the CNMI Bureau of Environmental and Coastal Quality Division of Coastal Resources Management is satisfactorily implementing and enforcing its federally approved coastal program, adhering to the terms of the federal financial assistance awards, and addressing the coastal management needs identified in section 303(2)(A) through (K) of the Coastal Zone Management Act.

Program Review Procedures

The NOAA Office for Coastal Management evaluated the Commonwealth of the Northern Mariana Islands (CNMI) Coastal Management Program in fiscal year 2020. The evaluation team consisted of Ralph Cantral, evaluation team lead, Robbie Greene, CNMI site liaison, Jean Tanimoto, acting Pacific region director, Craig Reid, federal program officer, and Caitlyn McCrary, communication specialist, all from the NOAA Office for Coastal Management; and Sandra Aigalesala Fuimaono Lutu, deputy director, Resources Management Division, American Samoa Department of Commerce. The support of the CNMI Coastal Management Program staff was crucial in conducting the evaluation, and their support is most gratefully acknowledged.

NOAA sent a notification of the scheduled evaluation to Eliceo D. Cabrera, administrator, CNMI Bureau of Environmental and Coastal Quality, on March 28, 2019, and published a notice of "Intent to Evaluate" in the *Federal Register* on August 27, 2019. The CNMI Coastal Management Program posted a notice of the public meeting and opportunity to comment in the *Saipan Tribune* and the *Marianas Variety News and Views* on September 11, 2019.

The evaluation process included a review of relevant documents and a survey of stakeholders, which helped identify three target areas for the evaluation: staff training and retention, interagency collaboration and communication, and tourism development pressures. 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, October 23, 2019, at 5:00 p.m. at the American Memorial Park Visitor Center Theater, Micro Beach Road, Garapan, Saipan, CNMI 96950 to provide an opportunity for members of the public to express their opinions about the implementation of the coastal program.

Stakeholders and members of the public were given the opportunity to provide written comments via email or U.S. mail through October 25, 2019. No written comments were received from the public or interested parties. The Office for Coastal Management then developed draft evaluation findings, which were provided to the coastal program for review, and the coastal program's comments were considered in drafting the final evaluation findings.

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

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

Evaluation Findings

The CNMI Coastal Management Program is administered by the Division of Coastal Resources Management, which is housed within the Bureau of Environmental and Coastal Quality under the Office of the Governor. The division is charged with coordinating the planning and implementation of coastal resource management policies for the commonwealth government, reviewing commonwealth government activities for their consistency with these policies, and ensuring the consistency of permit decisions with policies and regulations.

Target Area 1 – Staff Training and Retention

Examples of Key Efforts

In the 2015 evaluation, the NOAA Office for Coastal Management noted the difficulty of hiring and retaining qualified staff to work in the Division of Coastal Resources Management. A necessary action to address this issue was included:

Necessary Action (2015): The Division of Coastal Resources Management must maintain hiring standards and consistently fill vacant positions in a timely manner with qualified applicants and provide a report on hiring actions taken in the annual performance report until the necessary action is deemed completed by the Office for Coastal Management or the next evaluation.

The division has made tremendous strides in hiring staff and especially qualified local applicants. Northern Marianas College has developed a curriculum in natural resources management, leading to an associate's degree. The division has collaborated with the college to create opportunities that place students in paying internships within the commonwealth government. A number of former interns have graduated and obtained positions within both the Division of Coastal Resources Management and other allied programs within the CNMI government.

Accomplishment: The Division of Coastal Resources Management has succeeded in building a staff composed largely of qualified local residents.

By assigning Division of Coastal Resources Management internships to other government agencies and local partners, the division is fostering relationships with those agencies as well as building a pool of future potential job applicants. These cross-agency relationships are not always easy to create and internship programs are not common across programs, thus the offer of free interns is mutually beneficial at little cost to the division. Personal relationships between agencies have been improved through these efforts, but there are currently no governmental programs to foster longer lasting relationships between specific offices within the agencies. The new Office of Planning and Development may be able to help institute new measures that will increase interagency cooperation.

Accomplishment: The Division of Coastal Resources Management has joined with Northern Marianas College to create internship opportunities for local residents to gain employment in natural resource management agencies.

Recommendation: The Division of Coastal Resources Management should continue to support internship assignments in other agencies and work with the CNMI Office of Planning and Development to establish interagency training and job shadowing to ensure technical capacity that can withstand staffing changes within the agencies.

Unfortunately, staff retention continues to be a problem due to a variety of factors, including salary restrictions, austerity measures, training and travel limitations, and hiring status. A number of no-cost or low-cost options such as cross-training, local online training, mentoring, and local job shadowing would not adversely affect the day-to-day capacity of the office while giving employees opportunities to learn. Communications and conflict management training could be especially helpful for permitting and enforcement staff dealing with the regulated community. Job shadowing with other coastal management programs in the Pacific region could also provide significant benefits. Costs associated with these learning opportunities would be eligible for funding through the NOAA cooperative agreement.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management require all staff members to maintain individual development plans and appoint a staff member to coordinate training opportunities. Such plans could support improved job performance, maintain staff morale, and help avoid unnecessary changes to cooperative agreements.

The evaluation team learned that there was a general lack of knowledge among the staff about the tasks and award conditions associated with each year's grant. Broader communication could ensure that everyone in a supervisory role know how their sections fit into the overall goal of the various awards as well as any award conditions that pertain to the office in general.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management leadership meet with section leads and their backups to review each cooperative agreement in its entirety, including all special award conditions, after proposals have been approved by NOAA.

Another issue that has arisen in recent years is the austerity provisions implemented by the CNMI government. Due to budget concerns, the government has imposed restrictions that include mandated days off and restrictions on work hours. The requirement that employees not work except during prescribed hours has caused concern among program supporters that staff members are unable to enforce coastal laws adequately or attend public outreach events. Some of this lack of availability for enforcement is being picked up by volunteer Tasi Rangers (see Topic Area 2), but they do not have the authority to issue citations or act for the government in an official capacity. The staff also has challenges attending required training and

travel due to the restrictions. Staff members had previously been permitted to use flexible work schedules to enable them to attend relevant classes at Northern Marianas College, but this is precluded by the austerity measures.

Recommendation: The Division of Coastal Resources Management should identify the authorities who could lift the austerity restrictions and work with the federal program officer and the NOAA Office for Coastal Management leadership to remove the imposition of austerity measures on federally funded employees to ensure that the program is being implemented effectively.

Target Area 2 – Interagency Coordination and Collaboration

Examples of Key Efforts

The permitting section has made several improvements in interagency collaboration that have led to a more streamlined processing of permits. Pre-applications are now required and these are used to prepare a new Project Review Memo for the Review Board prior to the meeting. The Review Board members also now have regular designated backups, which has provided some consistency among reviews. The use of the summary memo and regular review designees has allowed agencies to comment on applications that may not have direct linkage to them but on which they may still have an opinion. In addition, the permitting app has proven to be very successful and useful in storm recovery efforts by the Federal Emergency Management Agency and NOAA.

Accomplishment: Instituting a series of improvements to the permitting process since the prior evaluation has led to agency reviews that are more thorough as well as faster turnaround times for applicants.

A partnership with the Micronesia Islands Nature Alliance has provided the Division of Coastal Resources Management with additional monitoring and enforcement capacity. The Tasi Watch Rangers and Adopt-a-Bin Program, and other volunteer efforts have given the division additional labor and capabilities that would not be possible using only agency staff. The Tasi Watch Rangers are able to use the division's Reef Report app on mobile devices to report environmental violations. These reports are linked to a web map that informs the enforcement section staff of the type and location of illegal activities. This has been especially helpful during the periodic austerity measures that prohibit agency employees from working on weekends and evenings when many violations occur.

The partnership with Micronesia Islands Nature Alliance's Schools for Environmental Conservation has also allowed the division to supplement its curriculum within the public school system. Going forward, this partnership could be an opportunity for the coastal program's educational plans and curriculum products that were developed under other

initiatives (e.g., *Saipan Lagoon User Education Guide*). This education partnership has also been helpful with implementing the visitor use impacts study by providing fieldwork opportunities for students to experience collecting data and understanding management of coastal tourism. This type of experience could be expanded to a number of other projects and tasks undertaken by the Division of Coastal Resources Management.

The Division of Coastal Resources Management has developed a partnership with the Bureau of Environmental and Coastal Quality's water quality program to conduct water quality sampling while coastal division staff collect visitor use data. In a similar effort, the division's marine monitoring team shares boat time with the Environmental Protection Agency to examine water quality in areas where enforcement actions have been taken by coastal program staff.

Accomplishment: The Division of Coastal Resources Management has developed ongoing partnerships with other agencies and nongovernmental organizations to reduce costs and increase coastal program presence in the community.

The commonwealth will be receiving increased funding related to the impacts of Typhoon Yutu. Federal consistency determinations about this funding may affect staff workloads. Similarly, two major new military projects will require increased levels of review. The Division of Coastal Resources Management needs to be flexible in responding to these challenges. Working with network agencies may be able to provide some assistance on project reviews and the like.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management work with the CNMI Office of Planning and Development to ensure coordination with network agencies in implementation of federally funded projects.

Target Area 3 – Tourism Development Pressures

The tourism industry is the biggest economic generator for the Northern Mariana Islands, yet tourism is dependent on a number of factors, including attractiveness of the natural resources, currency exchange rates, airfares from Korea and China, and the proximity of other markets such as Vietnam and other islands closer to mainland Asia. Protecting the commonwealth's natural resources is, therefore, key to sustaining tourism.

Examples of Key Efforts

During this evaluation period, the Division of Coastal Resources Management developed a number of additional projects addressing recreational uses adjacent to the shoreline, including a *Public Shoreline Access Guide* for Saipan, Tinian, and Rota that was published in September 2015. This guide was an effort to identify sites for a variety of water-related uses and to illustrate protected areas, appropriate uses, safety precautions, and specific rules for no-take marine conservation areas and species-specific conservation areas. Using Coral Reef Initiative funding, the division also initiated a monitoring program that tracks shoreline changes and

beach profiles to inform management decisions. The shoreline monitoring story map on the division's website has also proved to be useful in informing the public about changes in local beaches.

The *Saipan Lagoon Use Management Plan Update (2017)* is another tool developed by the division that looks at resource conditions, user needs, and management controls to provide guidance for decision makers with the goal of sustainable resource use. This plan update included a great deal of expert and public input to ensure that all interests were represented. The resulting report takes a very broad perspective. It examines specific uses as well as their permitting requirements, and makes recommendations for addressing watershed impacts.

In 2018, the Division of Coastal Resources Management initiated a project called Sustainable Sites to reduce impacts to coastal resources from tourist activities. With the number of tourist arrivals at more than 10 times the resident population, many of the existing tourism sites are being degraded. The program recognizes that the government has the responsibility to manage tourism sites by implementing controls such as user fees, and there is a great need for basic data to inform these controls.

The Sustainable Sites project is a partnership among several agencies. The Marianas Visitors Authority, the Division of Environmental Protection, the Division of Land and Natural Resources, Northern Marianas College, and the Office of Planning and Development are all active participants in the project. The first steps are to conduct assessments that survey visitor use, analyze the relationship between visitor use and water quality, and capture visitor perceptions of crowdedness at tourist sites through in-person interviews. The project will lead to data-driven management recommendations and site-specific carrying plans.

Accomplishment: The Division of Coastal Resources Management has developed innovative programs and interagency partnerships to understand and address the impacts of tourism on coastal and ocean resources.

Government fees are heavily affecting marine sports operators on Saipan, the most heavily populated and visited island of the Marianas. To avoid fees that the operators find excessive, ferries and other marine sports operations are using unpermitted sections of shoreline and docks. These unpermitted beach landings have created new challenges for coastal permitting and program enforcement. Although the Division of Coastal Resources Management and the Marianas Visitors Authority have not been involved with the development of these fees, they, and other government programs, are often lumped together in the eyes of the regulated community.

Communication and engagement with the marine sport operators has been difficult to this point, as outreach opportunities have been poorly attended. Sharing information about programs and projects of the coastal management program might be helpful to build the trust of this group. Information about public access planning and other projects that enhance visitor

experiences with the marine operators would build collaboration, and better position the coastal program as a partner in a shared vision.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management continue outreach within the tourism community to be seen as the primary contact for coastal planning wants and needs.

The tour guides and other ecotourism-based businesses are in need of additional information and opportunities to implement new, resource friendly practices. These tour operators may be eligible for a variety of funding opportunities, but have little ability to seek out new sources of funding. Funding availability (e.g., through various NOAA grant programs) is not routinely communicated to all CNMI agencies and partners. The Division of Coastal Resources Management can play a key role in extending information on funding opportunities for shoreline access and enhancement to partner agencies, as well as private stakeholders and nongovernmental organizations.

Recommendation: The NOAA Office for Coastal Management recommends that the Division of Coastal Resources Management work with the CNMI Office of Planning and Development in coordination with NOAA to develop a process for compiling and disseminating public and private grant opportunities to the relevant tourism associations and partner agencies.

Implementation of General Requirements

The 2015 program evaluation contained two necessary actions. A necessary action related to hiring practices is discussed in Target Area 1, above.

A second necessary action was related to consolidated audit procedures.

Necessary Action (2015): The Division of Coastal Resources Management must work with CNMI Department of Finance to add the CNMI Coastal Management Program as a major program to be audited under the FY14 A-133 Single State audit in compliance with the letter from NOAA's Acquisition and Grants Office to Larissa Larson dated August 21, 2014. The Division of Coastal Resources Management must share any findings of the audit and its response to those findings with the Office for Coastal Management and the NOAA Grants Management Division, and respond in a timely manner by meeting the deadlines to any final recommendations resulting from the outcomes of the audit.

Progress: The requirement has been met. The CNMI Coastal Management Program was included in the CNMI's fiscal year 2014 Single Audit and in subsequent years.

Evaluation Metrics

Beginning in 2012, state coastal management programs began tracking their success in addressing three separate 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 – Coastal Hazards

Goal: Raise awareness and develop strategies for adaptation to climate change and its impacts.

Objective: By 2017, the Division of Coastal Resources Management will produce education videos and games dealing with adaptation strategies to climate change and its impacts, especially sea level rise, and will present them to the schools and communities in the CNMI.

Strategy: The Division of Coastal Resources Management’s responsibility under the CZMA is to proactively plan for climate change adaptation and mitigation. The 14 low-lying islands in the CNMI archipelago are much more vulnerable to the impacts of climate change, particularly sea level rise and increased coastal erosion, among other impacts, because of low elevation and limited land size.

The Division of Coastal Resources Management will produce educational videos and games while it develops strategies for adapting to climate change, especially sea level rise. Once the videos become available, an ambitious outreach component is planned as the videos are presented and viewed in all the schools in the three most populated islands of the CNMI (Rota, Tinian, and Saipan) to ensure all the students from all levels become familiar with climate change. A video will be produced for each of the primary, elementary, secondary, and college levels. For purposes of this evaluation metric, a school will have viewed a video when all classes in the school showed the video and it was made available to all the students. An outcome evaluation component will be added to gauge the public perception at the end of the program period.

Performance Measure: Number of students attending a video presentation.

Target: By 2017, fifty percent (50%) of 4th and 9th graders from public schools have attended a climate change educational video viewing facilitated by the Division of Coastal Resources Management and completed the accompanying worksheet.

Cumulative Data: Over the course of the metric reporting cycle (through 9/2019) the Division of Coastal Resources Management Coral Program and coastal program Communications Team presented the climate change videos (sea level rise and flooding in the CNMI) to 4th and 9th graders at schools, after-school programs, and youth centers. Since project inception, 25% of 4th grade students and 25% of 9th grade students have viewed the videos. Some Education and

Outreach work from 10/01/2018 – 9/30/2019 was delayed or canceled due to the destruction caused by Super Typhoon Yutu that left a majority of schools on Saipan destroyed. Up to the end of this performance period, schools on the southern part of Saipan were still on half-day sessions and schools were relocated and combined with other campuses in makeshift tent classrooms, making it difficult to conduct school visits that led to not meeting the 50% target. However, the climate change videos were placed at the lone movie theater on Saipan, with the intention to extend communication reach to wider, broader audiences, especially the younger generation.

Discussion: The Division of Coastal Resources Management has developed an outreach program for elementary and high school students and has been diligent in its attempts to reach as many students as possible. Typhoon Yutu delayed the implementation of this program, but the outlook remains good for successful completion.

Metric 2 – Government Coordination

Goal: Improve enforcement presence, collaboration, and follow-through by sharing enforcement information with complainant, other enforcement agencies, and the public.

Objective: To ensure a more sustainable use of coastal resources by enhancing enforcement presence, collaboration, and follow-through.

Strategy: In order to meet the objective, the Division of Coastal Resources Management will convene a meeting of the five agency heads at least quarterly to form a tighter alliance and discuss enforcement matters collaboratively, as well as come up with ways to improve enforcement presence, collaboration, and follow-through among these regulatory agencies by sharing enforcement information. One way is to set up an online system with a simple spreadsheet attachment in which the division can update its enforcement information on a monthly basis simply and inexpensively. Apprising the complainant of the progress is another way of improving the process. Lastly, the Division of Coastal Resources Management anticipates closing each complaint violation within 90 days.

Performance Measure: Percentage of enforcement cases closed within 90 days.

Target: 80 percent of violation incidents are followed through from report of occurrence, investigation and response, and work performed, to closure and reporting, and notification of complainant and other enforcement programs are made through the online system within 90 days.

Cumulative Data: Data for the one full year with data available show that the average time for permitting and enforcement actions was 30 days, well below the 90-day goal.

Discussion: The new tracking software has allowed for a very high degree of transparency for enforcement cases, with 100 percent of violations and enforcement actions to be available for public viewing.

Metric 3 – Government Coordination (Federal)

Goal: Develop strategies to implement recommendations to fill identified gaps because of the capacity assessment of CNMI resource agencies (i.e., Division of Coastal Resources Management, Division of Environmental Quality, and Department of Lands and Natural Resources) conducted by NOAA’s Coral Reef Initiatives program.

Objective: By 2017, one-hundred percent (100%) of the recommendations in the Coral Reef Initiatives-hosted capacity assessment have been addressed and implemented.

Strategy: In continuing NOAA’s Coral Reef Initiatives program capacity assessments in the coral reef jurisdictions, the Coral Reef Conservation Program is scheduled to conduct a capacity assessment of CNMI’s resource agencies (Division of Coastal Resources Management, Division of Environmental Quality, and Department of Lands and Natural Resources) in the spring of 2013, which is scheduled to be completed by June 2013. The purpose of the capacity assessments is to identify capacity gaps in the coral reef jurisdictions and ways to assist the Coral Reef Conservation Program and the individual coral reef jurisdictions to improve the overall management of their coral reefs, with a focus on implementation of their coral reef management priorities.

The assessments will examine current capacity and identify gaps that need attention. “Capacity” includes institutional and governance frameworks (e.g., legal frameworks/mandates and enforcement, political will, etc.); local strategic planning (i.e., marine, coastal, and watershed spatial planning); and management, enforcement and evaluation capabilities. Staff recruitment and retention mechanisms, including the adequacy of local salaries; staff, leadership training and development needs; technical assistance, information, and data needs; equipment and related concerns; and coordination among agencies and partners and high-quality collaboration (e.g. data sharing, turf issues, conflict resolution) are also included.

By carrying out an independent, objective capacity assessment, the Coral Reef Conservation Program can gain a better understanding of how best to support and enhance local partners. Local agencies themselves can gain valuable insights that will assist them in their own planning. Perhaps most importantly, the Coral Reef Conservation Program and local jurisdictions will be able to work together to address and overcome persistent barriers that have limited capacity building to date.

The outcomes from the assessments will allow the Coral Reef Conservation Program to increase understanding of the roles, responsibilities, missions, capabilities, and needs of selected management agencies.

Once the assessment is completed, the Division of Coastal Resources Management administrator will lead the effort to implement all recommendations to fill the identified gaps, working on at least one recommendation per year until all the recommendations have been addressed and implemented.

Performance Measure: Percentage of recommendations implemented from the Coral Reef Initiatives capacity assessment of CNMI's resource agencies.

Target: Over the five-year period, one hundred percent (100%) of recommendations implemented from the Coral Reef Initiatives capacity assessment of CNMI's resource agencies.

Cumulative Data: On October 6, 2017, the governor signed SB 20-02, SD3, HD1, entitled, "To Establish the Office of Planning and Development; and for Other Purposes." This became Public Law 20-20. A director for the office was not hired until mid-2018. The Office of Planning and Development initiated conversations with the Division of Coastal Resources Management to discuss more collaboratively moving forward to achieve similar goals. The Office of Planning and Development's work has taken much of the burden off the Division of Coastal Resources Management in attempting to lead interagency coordination. This intentional process effectively achieved key action 4.1a from the Coral Reef Initiatives capacity assessment. Two recommendations of the capacity assessment remain unaddressed.

The Division of Coastal Resources Management completed two valuation reports in 2019. The update to the coral reef valuation report was completed in September 2019 and a valuation study of CNMI's wetland systems was completed in November 2019. A 2006 coral reef valuation study contracted through Cesar Environmental Economics Consulting was originally conducted to estimate the economic value of Saipan's coral reefs and their associated resources using various research methodologies, including household surveys, discrete choice experiment, total economic value calculation, spatial analysis, and sustainable financing. That economic valuation of reefs has been instrumental to the Division of Coastal Resources Management, and the 2014 Coral Reef Initiatives Capacity Assessment recommends updating this study.

As the socioeconomic data had not been updated since March 2006, the Division of Coastal Resources Management contracted a follow-up evaluation study through Eastern Research Group to fill in these data gaps for the ten-year period. Additionally, it expanded the depth of the assessment to evaluate total economic values of coral reef ecosystems in Saipan, Rota, and Tinian, as well as seagrass habitats in Saipan and the estimated values of biodiversity beyond research uses. Completed during this reporting period.

Discussion: This metric was a difficult one to implement as it relied on legislative and executive action outside the ability of the coastal management program. The evaluation team learned that processes are improving and that increased capacity at the CNMI Office of Planning and Development can help to offset lack of capacity at the Division of Coastal Resources Management. Unfortunately, the full capacity needed to achieve program goals has not been achieved.

Conclusion

For the reasons stated herein, I find that the Commonwealth of the Northern Mariana Islands is adhering to the programmatic requirements of the Coastal Zone Management Act and its implementing regulations in the operation of its approved coastal management program.

These evaluation findings contain seven recommendations. The recommendations must be considered before the next regularly scheduled program evaluation, but they are not mandatory at this time. Program recommendations that must be repeated in subsequent evaluations may be elevated to necessary actions.

This is a programmatic evaluation of the Northern Mariana Islands Coastal Management Program that may have implications regarding future financial assistance awards. However, it does not make any judgment about or replace any financial audits.

signed by Keelin S. Kuipers
Keelin S. Kuipers
Deputy Director
NOAA Office for Coastal Management

dated April 9, 2020
Date

Appendix A: Response to Written Comments

No written comments were received.