

**Evaluation Findings
for the
American Samoa Coastal Management Program
from
July 2000 through June 2005**

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Office of Ocean and Coastal Resource Management
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I. INTRODUCTION

Section 312 of the Coastal Zone Management Act (CZMA) of 1972, as amended, requires NOAA's Office of Ocean and Coastal Resource Management (OCRM) to conduct a continuing review of the performance of States and Territories with Federally approved Coastal Management Programs. This document sets forth the evaluation findings of the Director of OCRM with respect to the American Samoa Coastal Management Program (ASCMP) for the period from July 2000 through June 2005. This document includes Program Review Procedures, Review Accomplishments, Findings and Recommendations, and a Conclusion.

The recommendations made by this evaluation appear in **bold** type and follow the section of the findings in which the facts relative to the recommendation are discussed. The recommendations may be of two types:

(1) **Necessary Actions** address programmatic requirements of the CZMA regulations and of the ASCMP approved by NOAA, and must be carried out by the date(s) specified. There are no Necessary Actions within this document.

(2) **Program Suggestions** denote actions which OCRM believes would improve the management and operations of the Program, but which are not mandatory at this time. Program Suggestions that must be reiterated in consecutive evaluations to address continuing problems may be elevated to necessary actions.

If no specific dates are given for carrying out a Program Suggestion or a Necessary Action, the Territory is expected to have successfully implemented the Necessary Action or Program Suggestion by the time of the next Section 312 evaluation. The findings contained within this document will be considered by NOAA in making future financial assistance award decisions relative to the American Samoa Coastal Management Program.

II. PROGRAM REVIEW PROCEDURES

The Office of Ocean and Coastal Resource Management (OCRM) evaluation staff began review of the ASCMP in June 2005. This included an analysis of the approved ASCMP, previous and current award documents and performance reports, previous evaluation findings, correspondence relating to the ASCMP, and other relevant information. The OCRM Director's Office and the Coastal Programs Division (CPD) staff coordinated to determine the issues which would become the main focus of the evaluation. The Evaluation Team analyzed the Territory's responses to these specific issues and used them as primary sources of information on the ASCMP's operation.

The Evaluation Team gave special emphasis to the following issues:

- * The effectiveness of the Territory in monitoring and enforcing the core authorities which form the legal basis of the ASCMP;
- * The manner in which the ASCMP is providing technical assistance to village governments on coastal issues;
- * The manner in which the Territory is monitoring, reporting, and where necessary, submitting program changes to OCRM;
- * Status of ASCMP's efforts in public education and program visibility;
- * The manner in which the ASCMP coordinates with other Territorial, local and Federal agencies and programs regarding such issues as water quality and hazards;
- * The manner in which the ASCMP exercises leadership and addresses emerging coastal issues, such as improving interagency coordination of land use planning in American Samoa; and,
- * The status of Federal financial assistance awards.

John H. McLeod, Evaluation Team Leader, OCRM National Policy and Evaluation Division; Bill Millhouser, OCRM Coastal Programs Division, and Steve Snyder, South Carolina Coastal Program Manager, conducted a site visit from May 31 through June 10, 2005. The Evaluation Site Visit Team met with representatives of the Territorial and local governments, Federal agencies, interest group representatives, and private citizens during the site visit.

Prior to the site visit, the Evaluation staff provided written notice of the ASCMP evaluation to relevant Federal agencies and provided opportunities for them to respond. A Public Meeting was held on Monday June 6, 2005, at 4:00 p.m. in the Convention Center in Utulei, American Samoa. (**Appendix A** lists persons contacted in connection with the evaluation;

Appendix B lists persons who attended the Public Meeting; **Appendix C** contains NOAA's response to written comments received.)

The ASCMP staff were instrumental in setting up meetings and arranging logistics for the evaluation site visit. Their support is gratefully acknowledged.

III. PROGRAM ACCOMPLISHMENTS, FINDINGS AND RECOMMENDATIONS

The American Samoa Coastal Management Program (ASCMP) was established in 1980 under a federally funded program created to promote the management and protection of the coastal resources of the territory. The mission of ASCMP is to provide effective resource management by protecting, maintaining, restoring, and enhancing the resources of the coastal zone. Within the United States, the coastal zone is defined as the area within three miles of the coast. For American Samoa, as with many US Pacific Islands, this means that the entire territory is managed under ASCMP.

ASCMP is administered by the American Samoa Government's Department of Commerce (DOC). ASCMP's divisions include: Project Notification and Review System (PNRS), Water Quality/Non-Point Source Pollution Program, Cumulative and Secondary Impacts (C&SI), Community Based Management Wetlands Program, Geographical Information Systems (GIS), Public Awareness Campaign, and Ocean Resource Management Program (ORMP).

A. Personnel

Accomplishment:

ASCMP staff is commended for the dedicated work they perform in managing American Samoa's coastal resources.

The true strength of any program lies in its supporting staff, and American Samoa is fortunate in this regard. It is through their cumulative efforts that the significant accomplishments documented within this report have come to fruition. During the period of time covered by this evaluation, August 2000 through June 2005, the ASCMP has addressed many coastal issues and witnessed significant growth in terms of its program implementation. The programmatic results experienced in the past five years would not have occurred without the committed and talented leadership and staff of ASCMP. Ultimately, their actions have led to the specific accomplishments described herein.

Despite these accomplishments, as with previous evaluations, there remains the issue of staff turnover. However, given the scope of activities and challenges faced by the ASCMP, their nearly-full staff complement at the time of the evaluation site visit is a notable accomplishment in and of itself. The ASCMP wetlands position has proven to be a difficult position to recruit for and has remained un-filled for a substantial period. With the development of a robust geographic information system (GIS) and the great strides made in the acquisition, development and use of computer technology, ASCMP now finds that it is providing technical support to the whole American Samoa Department of Commerce. Unfortunately, while laudable, this is a situation which pulls ASCMP personnel time and energy away from the primary functions of the ASCMP. Likewise, given the expanded capacity of staff to address issues provided by the availability and use of spatial analysis and other computer technologies, it is time to consider expanded

professional input such as that provided by a staff biologist, attorney, or an environmental or civil engineer.

It is noted that subsequent to the evaluation site visit the ASCMP financial officer resigned. NOAA's Grants Management Division and OCRM, between July 2000 and July 2005, identified concerns and issues regarding: (a) the maintenance within ASCMP of an effective grants management function within the ASCMP team; and, (b) ensuring proper and accurate financial management by ASCMP staff and financial reporting to NOAA. ASCMP must make every effort to maintain a financial officer with authority over program finances and necessary administrative and programmatic support in order to maintain a sufficient level of financial management and reporting capability within the ASCMP team at all times.

Program Suggestion:

- 1. Given the level of spatial analysis and other computer technology development in DOC it is time to consider hiring a qualified Information Technology person for the whole department. Also an assessment of staff support to address regulatory issues should be undertaken. The vacant wetlands position should be filled as soon as possible.**

B. Application of GIS and Computer Technology

Accomplishment:

ASCMP is commended for the significant strides made during the review period in the acquisition, development and use of computer technology for communication; protection and management of files; geographic information system applications supporting planning and growth management, economic development, shoreline change and land use planning; and, web-site development.

At the time of the last evaluation site visit in August 2000, ASCMP had only one computer with internet access. In 2001, with the help of the Pan-Pacific Education and Communication Experiment by Satellite (PEACESAT) [<http://obake.peacesat.hawaii.edu>], Delta-Consortium (the American Samoa Government Distance Education, Learning and Telehealth Application) and MicroPac, a local computer consulting firm, established a small business network for internet applications and file sharing. At the time of the site visit, there were 41 computers with internet access with an additional 14 computers with intranet access only within DOC. Of those ASCMP has 15 computers with internet access and an additional 5 with only intranet capability.

The network for ASCMP supports a network file sharing environment where files are stored on a server and backups are routinely run to ensure that data and working days are not lost due to files being damaged either through deletion or hardware failure. ASCMP purchased a

firewall system to protect and secure the network from outside sources such as hackers and malicious users on the internet. The firewall has successfully preserved the integrity of the network and provided a secure environment for the files saved on the ASCMP server. A mail server anti-virus system was purchased to provide protection from viruses and worms that can harm a computer network. Additionally, every computer has anti-virus software that is loaded to protect the operating system and the files created for work.

During the review period there has been a significant effort for the creation of geo-spatial data for American Samoa. The collection of data was enabled through the use of Global Positioning System (GPS) technology and remotely sensed imagery from aerial photography and satellite data (2001 IKONOS and 2003/4 Quickbird imagery). The Islands where GPS data have been collected include mainly Tutuila, Ofu, Olosega, and Ta'u. ASCMP has been instrumental in the collection of infrastructure, geodetic, census, topography, parcel, and cultural data.

The ASCMP GIS Section has mapped more than 5,800 roads, driveways, and parking lots for Tutuila, Aunu'u and the Manu'a Islands. Attribute information for roads includes road type, road surface, highway number, and description. Other data collection activities have included creating a database of 16,204 buildings and also a business spatial database, collection of environmental data in collaboration with the American Samoa Environmental Protection Agency (ASEPA), and assisting the American Samoa Historic Preservation Office (ASHPO) with the mapping of historic features. The transition that has been successfully made from hard copy maps and AutoCAD technology to GIS-driven and GPS referenced maps that are directly linked into the permitting and review functions of ASCMP is a remarkable achievement for the program and one that is now serving as a model for other US Pacific Islands, specifically Guam and the Commonwealth of the Northern Mariana Islands.

In 2002 ASCMP assisted in the creation of the High Accuracy Reference Network (HARN), which created geodetic benchmark sites for American Samoa. The data collected ties the GIS data layers together in a common projection and datum. This allows for viewing and analyzing the 168+ GIS data layers contained within the "Databank" in a GIS environment.

Accomplishments of ASCMP/GIS include:

1. **Website:** ASCMP also hosts an internet site [<http://doc.asg.as>] for the American Samoa GIS User's Group. This website has received the ESRI Special Achievement in GIS Award at the ESRI International User Conference in San Diego in August, 2004. There are two additional websites that will be hosted through ASCMP. The first is an Internet Mapping Service (ArcIMS) that will have the domain <http://ashazards.doc.asg.as> and a metadata server that will have the domain <http://meta-amsam.doc.asg.as>. Currently the metadata server is only working on the ASCMP intranet. ASCMP also provides the maintenance and updating of the American Samoa GIS User Group website.
2. **T-HAT ArcIms Website:** The Tutuila Hazard Assessment Tool (T-HAT) was created through collaboration with NOAA Coastal Services Center (CSC) and

Pacific Services Center (PSC). T-HAT is a lightweight internet mapping application based on GIS hazard data used in American Samoa's recently completed Hazard Mitigation Plan. This tool was created to help the ASCMP in its planning and permitting processes. The website has been online for the past 6 months and can be viewed at: http://ekman.csc.noaa.gov/t_hat/viewer.htm. The T-HAT internet website will be mirrored in American Samoa at the following URL: <http://ashazards.doc.asg.as>. Both a server and ArcIMS software have been procured for the transfer of the website to American Samoa. The website will be used for local land use planning and the service will be available to the public for viewing and identifying natural hazards around one's residence.

3. **Metadata Server:** CSC provided a server for the installation of a metadata search engine that will become a node on the Federal Geographic Data Committee (FGDC) network. The metadata server is loaded with the most current metadata from the American Samoa GIS User Group Databank. The search engine works through an internet browser and queries the metadata based on keywords and spatial extents.
4. **GIS Regional GIS and Benchmarking Training Through Palau Community College:** The ASCMP/GIS Section, in collaboration with the American Samoa Community College's Information Technology Laboratory, provided GIS instruction to other agencies within the American Samoa Government. The training was part of a Regional GIS and Benchmark Training that was initiated by Palau Community College through a Department of Interior Grant.
5. **Data Creation and Dissemination:** ASCMP has been instrumental in the collection of infrastructure, geodetic, census, topography, parcel, and cultural data. There are over 168 GIS data layers that conform to the American Samoa GIS User Group Spatial Data Infrastructure.
6. **Spatial Data Infrastructure:** The Spatial Data Infrastructure (SDI) was initiated in February 2001. The SDI initiative promotes communication, increases data sharing, and provides guidelines and a framework for the collection and management of geo-spatial data. The SDI facilitates data sharing through common naming conventions and the storing of data within agreed upon directory structures that are stored as categories (i.e. Biology, Boundary, Census, Infrastructure, etc.). This data structure is universal throughout the Territory. ASCMP has been instrumental in the preservation and distribution of geo-spatial data for American Samoa within the SDI format and also the creation of metadata.
7. **American Samoa GIS Collaboration:** ASCMP has provided and maintained the most current version of the American Samoa GIS (ASGIS) User Group Databank for the past 3 years. In addition to the maintenance, the data has been distributed through the ASCMP website, FTP, and through coordination with on and off-Island agencies and departments. The collaboration that occurs through the

ASGIS User Group has provided an opportunity to pool resources to buy commercial satellite data for use in GIS mapping activities. Satellite data acquisition took place in 2001, 2003 and 2004 for American Samoa.

8. **Project Notification and Review System:** The use of GPS and GIS has become standard in many aspects of the Project Notification and Review System (PNRS) responsibility that ASCMP maintains. GPS coordinates are recorded for major site visits or special cases that are identified through the land use application process. During the past year there has been a significant increase in the number of flood and landslide risk maps that are requested by the ASCMP/PNRS section. A significant effort to aid in the identification of natural hazards that surround a residence was completed with the Tutuila Hazard Assessment Tool (T-HAT) developed by CSC.

C. Outreach and Education

Accomplishment:

ASCMP is commended for its ongoing work and progress on outreach and education to promote public awareness regarding the critical and unique environmental, economic, and cultural values of American Samoa's deep water, coastal, and watershed resources, as well as the mandate and functions of the program within the Territory.

The ASCMP Public Awareness Section (PAS) works closely with all divisions of ASCMP to ensure that the public is well informed about new projects and previously implemented programs. In addition to outreach, environmental education also falls under the responsibility of the PAS. Therefore a major task of the PAS entails outreach visits to American Samoa schools and youth groups. ASCMP continues to implement comprehensive outreach activities and programs to increase awareness of the importance of ocean, coastal, and watershed resource management issues to the general public. The sole purpose of these outreach activities is to enhance public knowledge of coastal areas and the social and physical processes that affect its coastal environment and health. Many of the awareness and outreach activities are done with *LeTausagi*, a cooperative, non-profit, interagency environmental educators group that is supported by and has close programmatic association with ASCMP staff. A variety of outreach events and activities designed to actively engage and educate the public about the status, significance, and issues of the marine and terrestrial environment of the islands are currently being used by the program, including:

1. **Wetlands Month.** Each May, American Samoan schools and communities engage in this national event by participating in various activities highlighting the importance and the value of the Island's wetlands. Much of the planned community outreach and education activities are participatory and include group tours and cleanups in wetlands, and

interactive and educational presentations on wetlands to youth groups, schools and villages, including trivia question activities.

2. ***Enviro-Discoveries Summer Camp.*** These youth camps provide a more practical and fun way for students to learn and increase their knowledge about coastal ecosystems and the environment as a whole during the summer. Usually three camps are scheduled and planned each summer and are sponsored by *Le Tausagi*. This has been found to be a highly effective method to increase youth awareness focusing on participants from age 8 through 13 years.
3. ***Coastweeks.*** This annual event serves as one of the major public outreach and awareness raising activities in the Islands throughout the year. With the assistance by *Le Tausagi*, ASCMP holds various public activities for all ages to promote and increase public awareness on issues pertaining to the coastal eco-system. Activities are planned to not only focus public attention on coastal issues, but the environment as a whole.

In addition to such yearly events, visits to various schools, youth groups and villages are regularly conducted by the ASCMP team. Information is provided to mass media vehicles which is one of the major tools use to deliver and carry out preservation messages to the public. These include monthly public service announcement commercials on radio stations on issues pertaining to the protection of American Samoa's coastal resources. ASCMP's PAS also assists other government agencies with their public education and outreach programs. For instance, ASCMP helps with Earth Day, Arbor Day and Fishing and Boating Week (all overseen by other agencies). The sum of these various public outreach activities throughout the year makes for a busy and eventful ASCMP staff schedule.

As a complement to the public outreach efforts conducted by the ASCMP PAS, the ASCMP Education Program focuses on encouraging the individual to become more aware of the value of coastal resources. This approach is used to encourage a more engaged response to coastal management policy, as well as encourage public interest to translate into strong public support for certain management programs. There are many techniques used by ASCMP to educate the public about coastal management and the coastal environment. The use of these techniques varies depending on the target population being educated and the type of information needing to be provided to do this. Specific public education accomplishments made by the ASCMP during the review period include:

1. ***Art & Tide Calendar.*** This annual project aims to showcase and promote student interest towards improving, protecting, and preserving the Territory's limited natural resources from the students own point of view through art work. ASCMP, in conjunction with other government agencies such as ASEPA and NOAA's Fagatele Bay National Marine Sanctuary, co-sponsor the printing of this document. In addition, private sector businesses donate and sponsor portions of this project.
2. ***American Samoa Science Symposium.*** In collaboration with the Department of Education, ASCMP helps fund and sponsor three local students for the annual National

Symposium. This program has been a successful event for students who excel academically in science research relating to the preservation of coastal resources.

- 3. *Water Quality Monitoring Program.*** The water quality-monitoring program is an educational outreach program designed to help students and young citizens of the Territory appreciate the importance of water resources and their quality. This program provides hands-on experience in collecting, analyzing, and reporting water quality data. It also teaches students about the causes and effects of human behavior on water quality, thus preparing them to become responsible citizens. Currently, five elementary and two high schools are participating in this program. The outcome of school participants has increased dramatically from the previous year.

Additional materials and educational programs that have been implemented within the last four years include a Scholarship Award, the printing of the Aunu'u Wetlands Poster, Wetland Video Tapes and the Environmental Display Unit. All of these materials or projects have been established and developed by ASCMP for the main purpose of educating the young and the public at large on issues and concerns relating to the coastal environment. Recently, ASCMP, in collaboration with the Coral Reef Advisory Group (education specialists from DOC and Marine and Wildlife Resources) started outreach and education specifically on coral reef health and management and the connection between the coastal environment and the coral reef ecosystem to several schools. Similar to the outreach programs, much of this education and awareness is done primarily in the local schools.

Despite the exceptional work to educate the public about the ASCMP and coastal resources, there remains a lack of understanding within the American Samoa government about the Program. While the functions and processes required by the ASCMP are being carried out, there is a lack of understanding that departments other than DOC and the ASCMP are part of a network, and therefore are a functional part of the ASCMP. An opportunity exists to bring about some of this education through the review of Memorandum of Agreements (MOA) between ASCMP and the networked Territorial Departments. The MOA have been in place for a number of years and should be revisited, particularly since a number of the department directors are new.

Outside of the government, ASCMP needs to continue and improve its efforts in reaching out to and working with traditional Village leadership to support best coastal management practices, including land use, water quality, and resource protection. In understanding the mandate and capabilities of the ASCMP, an ongoing dialogue needs to be effectively established and maintained with traditional leadership at the village level if ASCMP is to be ultimately successful. Technical assistance is an important element in building the capacities to make the appropriate decisions; education, political positioning and providing appropriate levels of support to traditional structures are also needed. A scheme for the development and execution of a communication strategy to maintain dialogue between the ASCMP and leadership at all levels needs to be thought out and implemented.

Program Suggestion:

2. ASCMP needs to continue to conduct internal outreach and education within the various departments of DOC and with other key Territorial government agency partners on: (1) the mandate and functions of ASCMP and its role and position within the overall Territorial government structure; (2) the necessary partnership support and compliance required of DOC departments and other partner agencies to ensure the efficacy and success of ASCMP functions; and specifically, (3) the oversight and authority roles that ASCMP is designed to provide from within the American Samoa government. As a deliverable from such internal outreach and education efforts within DOC and partner agencies, the aforementioned Memorandum of Agreements should be revisited and reaffirmed by all parties and updated if necessary. A scheme for the development and execution of a communication strategy to maintain dialogue between the ASCMP and leadership at all levels needs to be thought out and implemented.

D. Sustainable Management and Protection of American Samoa Mangrove Forests

Accomplishment:

ASCMP is commended for its ongoing work in support of the research to sustainably manage American Samoa's mangrove forests.

Staffs from the American Samoa Coastal Management Program, American Samoa Community College Land Grant Program, village councils of Nu'uuli and Masefau, and University of Tasmania are implementing three complementary activities to support the sustainable management of American Samoa's mangrove wetlands:

1. Assessing how Nu'uuli and Masefau mangroves will respond to projected relative sea-level rise, determining the change in position of mangrove margins and concomitant change in area, and describing the increased risk to villages from coastal hazards through the year 2100;
2. Monitoring long-term changes in mangrove community structure, indices of health, and response to relative sea-level rise; and,
3. Producing outreach products, including a poster highlighting values of American Samoa mangroves, periodic media releases, project fact sheets for village leaders, and design and construction of a mangrove viewing platform and educational signs at Lions Park, Pala Lagoon.

Complementary research components, with regional implications, will be conducted to:

1. Assess if there has been accelerated relative sea-level rise and an increase in the elevation

and frequency of extreme high water events in American Samoa through analyses of hourly tide gauge data dating back to October 1948;

2. Assess the technical and institutional capacity of Pacific small island developing States and territories to implement the American Samoa model for assessing shoreline response to projected relative sea-level rise; and,
3. Assess regional mangrove vulnerability to sea-level rise.

While mangrove wetlands were once prominent features at the mouths of most freshwater streams in American Samoa, the majority of mangrove area has been filled since the early 1900s, only five large mangrove stands remain, and wetland losses continue at a rate of about 2 hectares per year. Population growth, development, and relative sea-level rise present growing threats to American Samoa's 53 hectares of remaining mangrove wetlands, with concomitant threats to local communities residing in villages adjacent to these mangroves. Thus the intent of the project activities is to raise awareness of mangrove's valued functions, remind local communities of traditional wetland uses augment and restore a mangrove conservation ethic, and reverse trends of misuse and overuse of American Samoa mangroves. Accurate information on mangrove response to projected relative sea-level rise over coming decades will enable educated coastal land use planning decisions to minimize and mitigate mangrove losses, reduce the risk of damage to coastal development, and select and implement policies to manage mangrove response (abandonment, adaptation, habitat rehabilitation, and coastal hardening) deemed suitable for different sections of coastline. The assessment results provide managers with information to relocate existing development and locate new development to avoid areas subject to increasing threat from coastal hazards as a response from relative sea-level rise, enable mangroves to migrate inland as a natural response to relative sea-level rise, and to rehabilitate mangroves to offset projected mangrove losses from response to relative sea-level rise.

Research results from American Samoa will be extrapolated region-wide to assess mangrove threat from sea-level rise; information which is of regional and international significance. The monitoring protocol and method for assessing shoreline response to relative sea-level rise will serve as a template for replication throughout the Pacific Islands region, serving as a precursor for establishment of a regional Pacific Islands mangrove monitoring network. Establishing baselines of mangrove structure and functional performance and monitoring gradual, long-term changes through regional networks will enable the separation of site-based influences from global changes in relative sea-level and climate.

Specific activities accomplished to date include:

1. A standardized mangrove assessment method has been developed to be used for long term site-based monitoring. The monitoring program supplies basic information on trends in changes in mangrove structure, area, degree of disturbance, and capacity to respond to rising sea-level, enabling informed management actions.
2. The American Samoa Coastal Management Program and University of Tasmania

convened a workshop 30-31 August 2004 to develop the American Samoa mangrove monitoring manual and conduct preliminary field studies. The workshop was attended by fourteen participants from the American Samoa Coastal Management Program, American Samoa Community College Land Grant Program, American Samoa Environmental Protection Agency, U.S. National Park Service, and Mayor of Nu'uuli Village. The resulting American Samoa Mangrove Monitoring Manual is a working document, to be adapted as constructive changes are identified by the monitoring team.

3. In August-September 2004, the monitoring team delineated locations for 8 transects, installed 21 sedimentation stake stations, and installed 3 vegetation plots in Nu'uuli mangrove, and collected monitoring data from the sedimentation stake stations and vegetation plots in Nu'uuli. In November 2004 the monitoring team installed 2 transects and sedimentation stake stations in Masefau. In March 2005 the team measured sedimentation stake elevations at the two study sites.
4. Assessment of how the area and position of mangroves typical of high islands will respond to relative sea-level rise and what the concomitant effects will be on the adjacent shoreline is being done by determining a range of projections for relative sea-level rise for American Samoa through the year 2100, using hourly tide gauge data from Pago Pago, American Samoa from 1948 to present and projected scenarios for global sea-level rise of the Intergovernmental Panel on Climate Change.
5. Outreach components include the development and production of an educational poster in Samoan and English "Mangroves and the Samoan Way of Life" and the design of a mangrove viewing platform and educational signs for construction (through a U.S. Fish and Wildlife Grant) at the Northern end of Lions Park, overlooking Nu'uuli mangrove.

The ASCMP team needs to work with partner American Samoa Government and Federal agencies in the coming years to improve management of critical mangrove habitats..As the recent research noted above illustrates clearly that significant threats currently face American Samoa's mangrove forests.

E. Ocean Resources Management

Accomplishment:

ASCMP is commended for development and initial implementation of the Ocean Resources Management Plan.

The Ocean Resources Management Plan (ORMP) is one of ASCMP's newly developed enhancement programs developed under CZMA Section 309 funding. The goal is to better manage American Samoa's ocean and ocean-related resources. ORMP began in April 2002 with successive meetings and workshops among various community leaders, government and non-government agencies, led by ASCMP to develop an ocean resource management process and plan for American Samoa. The framework for the management plan was closely drafted by the Coral

Reef Advisory Group (CRAG), with a broader scope of designing a five-year plan for managing American Samoa's entire ocean and ocean-related resources. The Social Science Research Institute of the University of Hawaii at Manoa Campus conducted background research in October 2002, facilitated the planning process through January 2003, and drafted an initial Ocean Resource Management Plan in May 2003, which was reviewed in June 2003. The primary intention of the ORMP is to integrate and streamline all natural resource management planning efforts within American Samoa under one all-encompassing Ocean Resource Management Plan for American Samoa. The plan supports the coordination and implementation of existing resource management plans, including, but not limited to, the Coral Reef Management Plan, the Non-Point Source Pollution Control Program, the Watershed Protection Plan, the Port Master Plan, the Five-Year Fisheries Management Plan, the Village-Based Community Fisheries Plan, and the Marine Resources and Management Plan.

Shortly after review of the ORMP, in August 2003, the Governor issued Executive Order No. 004-2003, establishing an ocean resource management process and plan for American Samoa. The executive order established the organizational structure and responsibilities for the ORMP, with the establishment of the Ocean Resource Management Council, the four resource advisory groups: Watersheds, Nearshores, Harbors, and Territorial and High Seas; and, task forces and *ad hoc* committees for the Council and Advisory Groups. By January 2004, the Advisory Groups crafted a set of priorities and strategies for managing each resource area. In July of 2004, an ORMP Coordinator was hired to coordinate the ORMP process and develop the priorities and strategies into a five-year action plan. This has led to improved interagency cooperation among government and non-government agencies. Advisory Groups, composed of various agencies, are further able to achieve their mandate to design and implement their 5 Year Action Strategies through the ORMP Coordinator's leadership.

From September to December 2004, Advisory Groups met regularly to develop, assess, and finalize their five-year action plans for implementation in 2005. In 2005 the Advisory Groups began implementing their action strategies, where member agencies in the Watershed Advisory Group (WAG) conduct quarterly briefs to enhanced interagency management plan coordination. The Nearshore Advisory Group (NSAG), also known as the Coral Reef Advisory Group, held successful workshops in the community on the impacts of over-fishing in coral reefs and an enforcement workshop to train local law enforcement officers. The Harbor Advisory Group (HAG) also conducted a Port-Users information seminar to address oils and toxins in Pago Pago Harbor. And the Territorial and High Seas Advisory Group (THSAG) created an ad hoc committee to perform reviews to identify information gaps in the knowledge of sustainable fisheries.

Building on the progress made under the ORMP efforts, there remains a strong need to integrate ASCMP and other American Samoa Government agency planning and management activities within priority watersheds. It is suggested that the focus of such activities be expanded beyond the developed coastal margin of flat and low-lands into higher elevations where unregulated agroforestry and agriculture practices (such as taro cultivation on steep grades and ridges and slash and burn practices of land clearing for agriculture), human and animal waste disposal (such as piggery pollution), and water availability and safety (such as leptosirosis and

other waterborne public health concerns and the availability of clean drinking water) need to be addressed in a comprehensive manner. Given the traditional land ownership system of American Samoa, watershed planning and management will only be successful if it is community based, and engagement of affected villages. ASCMP should consider working with a few priority watersheds and respective resident communities.

Finally, it should be recognized that the ASCMP shares overlapping authority with ASEPA and DMWR in many areas including Ocean Resource Management, Coral Reef protection, and Marine Protected Areas. As such, the sharing of information and resources is encouraged, as is consultation when decisions are to be made regarding the protection and use of these resources.

E. Coral Reef Activities

Accomplishment:

ASCMP is commended for its support of the Coral Reef Initiative through development and support of the Coral Reef Advisory Group.

The American Samoa Coral Reef Advisory Group (CRAG) is a collaboration of five different agencies in the Territory, all of which have some link to the coral reef environment. ASCMP played a significant role in its creation and maintains an active involvement in CRAG as well as provides support for its activities. Crag members include the Department of Marine and Wildlife Resources (DMWR), the American Samoa Environmental Protection Agency (ASEPA), the American Samoa Community College (ASCC), the National Park of American Samoa, and DOC/ASCMP. A primary role of the group is in planning strategies to address various areas of coral reef protection in American Samoa. Since inception CRAG has increased the effectiveness of member agency collaboration on numerous projects and has created greater alignment with non-CRAG organizations that have a common interest.

In 2000, in response to the efforts of the U.S. Coral Reef Advisory Group, the Governor requested the assignment of 20% of the Territory's coral reefs as no-take areas by 2010, while accommodating village subsistence fishing needs. Addressing this request, the Government of American Samoa, via CRAG, agreed to develop and implement a Territorial Marine Protected Areas Plan (MPAP). The ongoing development and design of a draft version of the Territorial MPAP is the direct result of the efforts of a Marine Protected Area Coordinator who was employed in 2004 through NOAA funding and who has fostered a partnership and coordination between Fisheries, ASCMP, and several other government agencies on this collaborative effort.

The Territorial MPAP details the planning process for the network and emphasizes the importance of using adaptive management strategies for evaluation and review of management policies. Specific coordinating mechanisms for regional, federal, territorial and community based management regimes are recommended. MPAP proposes a marine zoning scheme that considers

multiple uses, no-take areas and traditional practices.

F. Ocean Symposium

Accomplishment:

ASCMP is commended for sponsoring the Ocean Symposium of May, 2005.

An Ocean Symposium of May 23-26, 2005 provided a forum for a wide range of stakeholders, policy makers, managers, local and off-island participants to share, discuss, and work to resolve issues relevant to ocean and coastal areas. Participants included representatives of the American Samoa Government, the Secretariat of the Pacific Regional Environment Programme (SPREP), the South Pacific Applied Geoscience Commission (SOPAC), NOAA, U.S. Coast Guard, Department of the Interior, Coastal States Organization, East-West Center, and individuals from the community.

The goal of the symposium was to increase environmental stewardship among the community as well as foster partnership between national, regional, local and federal entities. Another goal for the Symposium was to obtain comments for the development of a Territorial Ocean Policy leading toward the drafting of an Ocean Statute for American Samoa. This proposed policy was identified by the Ocean Resource Management Council as a priority for the Territory to promote more awareness of ocean issues as well as to highlight management lessons that are shared among regional, national and federal bodies; announcements and planning started in October 2004.

Outcomes of the Symposium included the placement of a geodetic marker in Aua Village to commemorate the partnership that allowed the removal of longline fishing vessels from the reefs in Pago Pago harbor in 2000 and support for the creation of a territorial marine laboratory in American Samoa. The 25th year of ASCMP implementation was celebrated and the importance of the Pacific contribution to the Integrated Ocean Observing System was noted. The final outcome was a resolution, signed by the Governor and NOAA Deputy Assistant Secretary, pledging to work for and support the development of the territorial marine laboratory in American Samoa.

H. 2003 All Islands Meeting and Accord

Accomplishment:

ASCMP is commended for conducting the 2003 All Islands Meeting which led to the All Islands Accord.

In 2003, American Samoa organized and coordinated the comprehensive set of logistical and substantive requirements for the annual All Islands Coastal Management Program Manager's

meeting. Over 100 local and regional managers and staff from coastal management related agencies and organizations participated in this two day event which included presentations, discussion, and field site visits. The event culminated in the promulgation of the All Islands Accord which resolved to call upon the U.S. Congress, Executive Branch and Commission on Ocean Policy to develop a long term program that “recognizes the unique cultural values of each island jurisdiction and includes:”¹ regional approaches; technical assistance and training; management driven research; targeted grant programs; and, assurance that the activities of Federal agencies do not cause degradation of sensitive islands coastal ocean resources.

I. Capacity Building

One of the ongoing issues of ASCMP implementation is in developing ongoing capacities for execution. An indication of this need is the inability to recruit, retain and maintain trained and knowledgeable staff. A particular need is to hire local individuals who will have a long-term commitment to the Program. Another indication is the ongoing need to educate the partnered agencies about their responsibilities in implementation of coastal management, not just the implementation of their own regulations. While education and training represents a stock answer to dealing with such issues, the realities are much more complex. Certainly training should be stressed for certain technologies such as GIS and GPS applications. However, other areas require more subtle responses.

More Federal agency involvement is needed to support the ongoing implementation of the ASCMP in terms of actual on island interaction. As in the past, the Federal agencies admit that they rarely travel to American Samoa. Except for EPA and the U.S. Fish and Wildlife Service (see discussion under Federal Agency Support) involvement tends to be issue driven and there have been few issues to warrant attention. While this should change for the ASCMP with the placement of a NOAA individual in Hawaii to provide support to the Pacific Island coastal management programs, direct involvement should be the goal.

There are plans which if implemented would expand the capacities of the ASCMP and its networked agencies. The recently proposed Territorial Marine Lab, representing the resources of the Pacific region and its nations would place American Samoa in a leadership position within the community of islands in its area. In doing so, the capacities of the resource agencies, including ASCMP, would be enhanced.

Given the opportunities which exist, there remains the need for training and education activities. Continued public education and outreach beyond that discussed above is needed. With the initiation of a “one stop” permitting process, the public as well as the participating agencies will need training and reinforcement in the new process and how it works. As employees are brought on board, a program of orientation should be provided so that they are fully aware of the intent of the ASCMP and how it operates. Such an implement does not now exist.

There was some discussion outside the context of this evaluation regarding the

¹ Resolution of the All Islands Coastal Zone Management Meeting, August 7, 2003.

reorganization of all environmental agencies into one department. For a number of reasons, both administrative and programmatic, this would not represent a viable option in furthering coastal resource management and protection. At the management level, a problem of assuring a direct track to CZMA funding expenditures would need to be created, one which has been problematic in the past when there has been a clear track and organizational relationship tied to CZMA funding. One of the programmatic strengths of the ASCMP lies in its planning function as they relate to the business community to assure balance of resource use and preservation. Such an important governmental tool could well be lost if the links to that community were lost or obfuscated through other governmental levels. For these and many other reasons OCRM does not feel that creating a large environmental agency from the existing agencies is a worthy area of pursuit.

Finally, the capabilities of the networked agencies should be tapped to enhance the capabilities of American Samoa as it implements the ASCMP. An example would be to support the Historic Preservation Office (HPO) to develop a training program for individuals to learn what to look for on a site to support cultural assessment where development is proposed. Currently there is nothing in the code to protect cultural sites and artifacts. Though situated in the Governor's Office, the HPO has no tool to assure that the cultural element of the environment is protected. Absent legal recourse, such training would expand the capabilities of the inspectors while supporting the protection of American Samoa's valuable tangible heritage.

Program Suggestion:

- 3. ASCMP should develop an orientation program for new employees, both within the Department, and within the networked Departments. In developing such a program, consideration should be made regarding its use as a tool for public education in general. ASCMP should seek out opportunities to expand and use the capacity of its partners at and from the Federal and Territorial level.**

J. PNRS Permit Monitoring and Enforcement

During site visit meetings it was noted that each of the PNRS agencies was good about developing permit conditions. The problem is that there is inconsistent follow-up to assure that the conditions are met, even when there is a requirement that there be notice before there is action on the permit or a part there-of. Each agency has its own set of issues, and each has its own set of enforcement personnel all of whom do not always work in concert. According to ASEPA, there is an instrument that discusses enforcement and states that each agency must enforce its own conditions. In practice, if not on paper, there is confusion as to whether each agency, or ASCMP, is responsible for monitoring and enforcing permit conditions. This would work if there were a team approach to enforcement, where a group of people from the regulatory agencies worked together on site inspections. It does work somewhat since the different staffs are in communication with each other, particularly when they take an enforcement action. However the problem persists in the follow up on conditions. There is a need to reinvigorate the permitting

process and clarify the process for the monitoring of permit conditions' involving all the agencies.

The lack of enforcement of un-permitted actions or permit violations remains a serious problem which has the potential to undermine public support for the ASCMP. While the monitoring which does occur identifies violations resulting in corrective action, the corrective action is more often than not the issuance of an after-the-fact permit. An instance of a church clearing and filling a protected area which contained wetlands without a permit and in violation of basic regulations was discussed. The end result was that an after the fact permit was given, the action was allowed and the resource was lost. At the time of the evaluation site visit, another serious violation involved an illegal construction of a wall at a commercial site which resulted in the flooding of a portion of the adjacent public road. These situations indicate the relative limited

strength of the program to protect resources. It is also instructive of the capability of the ASCMP to bring about protection, to assure that decision makers are aware of the impact of their actions, and of the overall position of the program in the awareness of the community.

The ASCMP needs the ability to obtain an agreement with village leadership regarding follow up monitoring in each village. For instance, village leadership may at one time agree to an action in the future, but when the future comes, the collective memory requires a new agreement. A village may agree to monitor on a site, but when one returns to carry out the monitoring, the issue must be resolved anew. A simple one page document which defines the action to be taken (like the allowance of monitoring at a site and the protection of the equipment at the site) should be developed and signed. Such an agreement would define the agreed to measures to be taken by each party and would document the agreement by the village leadership. This might also be a mechanism to assure compliance with the land use definitions within the ASCMP.

Basically, enforcement needs to be significantly improved and more teeth need to be added to the stop order capability. In a meeting with the review team, the newly-appointed Attorney General (AG) stated that he would not hesitate to take a case to court (to litigate) provided the agency has done the enforcement right from the beginning. ASCMP needs to improve the gathering of facts in a case to develop it into a case for litigation. The ACSMP is in the process of hiring a lawyer to assist in these important enforcement matters. While ASCMP cannot go to court directly (only the AG is authorized to litigate) it should recognize that failure to respond to a stop order is an event that the AG would litigate. While the AG identifies a problem with the un-evenness of enforcement of regulations, if the agency with jurisdiction exhausts administrative remedies the AG will take the matter to court.

Program Suggestion:

- 4. ASCMP should work with the networked agencies to develop and implement an approach to integrated monitoring and enforcement of program functions to ensure that permit conditions are fully met and to monitor for, document, and address unpermitted activities including, potentially, those mistakenly undertaken through American Samoa government agency action. A**

procedure to ensure ongoing monitoring at the village level which includes local public participation and community support also needs to be developed.

K. Emergency Management

In July, CRMO was involved in meetings to incorporate new flood elevations and “V-zones” developed by the US Army Corps of Engineers (Corps) into T-HAT (Tutuila Hazard Assessment Tool) for more accurate review of flood elevations and zones. These have been used since August 2005 in the permit review process. This resolves an issue of the previous evaluation; however, discussions with Federal Emergency Management Agency (FEMA) personnel indicated that they were unaware of such actions and it was their belief that American Samoa had taken no action regarding the Corps work.

Program Suggestion:

- 5. ASCMP should work with the Federal Emergency Management Agency to rectify issues of perception and document its commitment to take protective measures needed within the mapped V-zones.**

L. PNRS Site Plan Documents

Site plans are a required part of a construction permit application. While there was never an attempt to have an engineered site plan, the desire is to have a plan that identifies the location of the proposed activity or activities on a map. A definition of what is to be done and the environment within which the activity is proposed is also needed. Initially, in the PNRS process, ASPA did the site planning; a practice they have ceased doing because it proved too costly. DPW staff has also developed site plans for applicants outside of work hours, with varying degrees of accuracy.

Currently, regardless of who developed the site plans, a number of faulty site plans may accompany a permit application. When site plans are received and found to be inaccurate, an occurrence in 2 out of 3 cases, they are either returned or corrected in the field. The problem with field correction, which is the usual occurrence, is that the alterations do not get back to the ASCMP GIS staff, creating a situation where there is faulty data in that system. Correct site plans from the beginning should be the solution and field corrections should be rare, if non-existent. Likewise, an environmental assessment should be part of the site planning process; currently it is not a routine consideration. On those occasions where there are field corrections, the corrections should be noted to GIS personnel.

Program Suggestion:

- 6. ASCMP should consider, with the PNRS regulatory agencies, the**

development of a site plan certification program, including: training in the development of a site plan; certification of the training; development of a list of certified and trained individuals who do site plans; acceptance of site plans only from those on the list; and, quality control of the list so that after several faulty site plans are submitted, an individual is removed from the list until they receive more training and new certification. In instances where site plans are corrected in the field, a process to have the change communicated to the GIS needs to be created.

M. Permitting

The permitting process remains an opportunity for the ASCMP. It was mentioned to the review team that one Agency sometimes meets with applicants ahead of the application and “makes agreements on the pre-application.” There have been 3-4 cases in the last year where this has occurred with sites in the low-land rain forest, an area which is protected in the rules and should have no development at all. Part of the problem is communication, another part is in not fully understanding the process and part an unjustified end-run for the applicant. Whatever the reason, such circumvention of the procedures harms the process and either establishes a negative feeling for government in general (including the agency involved) by the public or is a flagrant attempt to get something done in a resource use sense that otherwise should not occur.

Another area of potential improvement is the coordination with the Business Section, located in the DOC. This Office often issues business licenses before other permit requirements have been met. To address this issue, at a retreat last year, the concept of a “consolidated application” for the DOC permit processes which would include consolidated tracking and consolidated monitoring and enforcement was discussed. As a result the consolidated permit process will soon receive public notice with a goal of full implementation at the first of the fiscal year.

Program Suggestion:

- 7. ASCMP should assure that inconsistencies, whether real or apparent, in the application of the PNRS process not occur. The joint permitting process within DOC should move forward to full implementation. ASCMP should also revisit the ASCMP rules as part of the review of MOA’s, firming up the site plan development process, and in support of other recommendations in this document.**

N. Special Management Areas

The American Samoa Administrative Code defines special management areas (SMA’s) and establishes the authority, procedures and criteria associated with their establishment (ASAC 26.0221). Currently there are two designated Special Management Areas (SMAs) within

American Samoa; the Mu'uuli Pala wetlands and the Leone Pala wetlands. There is an existing proposal to designate Malaeimi Valley as a SMA, but as of the site visit of this review, no action had been taken by the American Samoa government. Once designated, it is the responsibility of the ASCMP to develop specific management plans for each area.

While designations have been made, there are no rules or regulations to guide what is to occur within the SMA boundary. Likewise, there is no plan to guide the development of SMAs within American Samoa, despite activities to acquire significant tracts such as the 28 acre lowland forest tract in Tafuna using Forest Legacy funding. There is, however, a growing recognition that watershed management can be facilitated by use of SMAs as a tool for management.

Program Suggestion:

- 8. ASCMP should develop policies, rules and regulations for the identified SMA's and designate additional critical areas needing protection.**

O. Federal Agency Support

While Federal agency support is given to American Samoa, it more often takes the form of funding, than direct involvement by Federal agency staff. What is needed, and desired, along with the funding, is the direct involvement by Federal agency regional personnel in American Samoa. The Environmental Protection Agency (EPA) is an example of the positive benefits that accrue with direct involvement of regional personnel. EPA funds two personnel in ASEPA and regional personnel stationed in San Francisco routinely go to American Samoa to work with their counterparts there. Such visits occur quarterly and are for periods of more than a week, allowing for ample opportunity to interact with the staff, conduct training, and assure that the defined mission being funded remains on track. Unfortunately, EPA is the exception.

The U.S. Fish and Wildlife Service (FWS) used EPA funding to carry out field work in the larger watersheds of American Samoa. Done in support of ASEPA, travel and expense funds were provided to FWS to support a study in areas defined as up-slope land uses to address threats to streams, and threats to coral reefs in front of the watersheds. Field work was carried out with local individuals working with the FWS staff to carry out technical support and capacity building. The goal was to create a workable watershed monitoring program for the local villages.

Direct involvement on American Samoa by OCRM personnel remains limited, though there is ongoing communication with and between ASCMP and OCRM. A meaningful presence on Tituila, not just a short stopover, should become the norm. OCRM might explore the funding approach of EPA to add support to its own costs of travel to American Samoa. Likewise, OCRM should work with its Federal counterparts to assure support to the goals and objectives of the ASCMP and the unique needs of the Island Program.

P. Relationship with Fagatele Bay National Marine Sanctuary

A close working relationship between the Fagatele Bay National Marine Sanctuary and ASCMP has existed through the history of the Sanctuary. Administratively housed in the DOC Coastal Resource Management Office, the Sanctuary has one Federal employee, the Manager, and three American Samoa government employees supported with NOAA funds. The boundary of the Sanctuary is also a designated Marine Protected Area of American Samoa. The Sanctuary Manager sits on the Coral Reef Advisory Group and on other groups supporting the objectives of the ASCMP.

The biggest threat to the Sanctuary is overfishing, a significant threat to all the coral reefs of American Samoa. Other threats include water quality, erosion and sedimentation, coral bleaching and population growth. Because of these threats it would be desirable to have the Fagatele Bay watershed be designated a Special Management Area (along with the watersheds of all marine protected areas) under the ASCMP.

IV. CONCLUSION

Based on OCRM's review of the federally approved American Samoa Coastal Management Program and the criteria at 15 CFR 928.5(a)(3), I find that American Samoa is adhering to its federally approved coastal management program. Further advances in coastal management implementation will occur as the Territory addresses the program suggestions contained herein.

These evaluation findings contain eight (8) recommendations which are program suggestions that the Territory should address before the next regularly scheduled program evaluation and which are not mandatory at this time.

This is a programmatic evaluation of the ASCMP that may have implications regarding the Territory's financial assistance award(s). However, it does not make any judgment about or replace any financial audit(s).

Date

David M. Kennedy, Director

**American Samoa Coastal Management Program
312 Evaluation**

PERSONS CONTACTED DURING THE EVALUATION

Togiola Tulafono	Governor
Ipulasi Sunia	Lt. Governor
American Samoa Department of Commerce	
Faleseu Eliu Paopao	Director
Lelei Peau,	Deputy Director
Gene Brighthouse,	Program Manager
Environmental Planning	
Ryan Binns	Environmental Planner
Apelu Aitaoto	Community Liaison Officer
Project Notification and Review System (PNRS)	
Veronika Mortensen	PNRS Coordinator
Eti Eves	Senior Community Resource Officer
Peniamina Siatunu'u	Enforcement Officer
Lia'i Tauanu'u	Internal Community Resource Officer
Aukusitino Mao	Internal Community Resource Officer
Mindy Afalava	Financial/Personnel Supervisor
Rachael Peters	Specialized Clerk IV
Enhancement Program	
Junior Sauni	Village Conservation Officer, Wetlands Section
Puletasi Wong-Mageo	Coordinator, Ocean Resource Management Section
Non-point Source Pollution	
Stephen Frano	Water Quality Specialist
Public Awareness Program	
Soli Tuaumu	Public Awareness Coordinator
William Stanley	Summer Intern
Data Management and Mapping/GIS	
Troy Curry	GIS Planner
Matthew Allen	GIS Technician I
Tali Tuinei	GIS Technician II
Historic Preservation Office	
John Enright	
David Herdrich	

American Samoa Environmental Protection Agency
To'afa Vaiaga'e Director
Edna Buchan
Peter Peshut

American Samoa Attorney General's Office
Sialega Togafau Attorney General

American Samoa Power Authority
Mike Dworsky
Fa'afetai Wells
Kris McPhee

American Samoa Department of Public Works
Punafo Tilei
Myron Thompson
Ta'afua Ta'afua

American Samoa Department of Marine and Wildlife Resources
Ray Tulafono Director
Doug Fenner
Alofa Tuaumu

Coral Resources Advisory Group

Lelei Peau	DOC, Chairman
Peter Craig	National Park of American Samoa
Virginia Farmer	DMWR
Doug Fenner	DMWR
Edna Buchan	ASEPA
Darren Okimoto	ASCC
Nancy Daschbach	NOAA, Fagateli Bay National Marine Sanctuary
Gene Brighthouse	DOC/ASCMP

American Samoa Geographic Information System Working Group

Troy Curry	DOC
Pete Tuaolo	DPW
Faafetai Wells	ASP
Pete Ioane	ASP
David Herdrich	ASHPO
Ryan Binns	ASCMP
Francesca R'lolo	DMWR
Hope R. Anderson	ASEPA
Nancy Daschbach	NOAA
Natoola Lynch	ASP
Tim Currey	ASP

James Sword Land Grant
Rosa Tavita FBNMS

Federal Agencies (In order of encounter.)

Carl Goldstein U.S. Environmental Protection Agency
Michael Hornick Federal Emergency Management Agency
Michael Molina U.S. Fish and Wildlife Service
Bill Thomas NOAA Pacific Services Center
Kristina Kekuewa NOAA Pacific Services Center
Nancy Daschbach NOAA National Marine Sanctuaries Program
Peter Craig National Park Service

Others

Eric Gilman ELG Environmental Services
Mike Hamm

**American Samoa Coastal Management Program
312 Evaluation**

PERSONS ATTENDING THE PUBLIC MEETING*

The Public Meeting was held on Monday, June 6, 2005 at 4:30 PM in the Convention Center in Utulei, American Samoa.

Attendees:	Doug Neighbor	P.O. Box 4423
	Lokeni A. Nuusolia	P.O. Box 3351
	Steve Cortez	P.O. Box 7903
	Jim McGuire	P.O. Box 1180
	Chris Hawkins	P.O. Box 8067

The meeting was called to order at 4:30 pm. The meeting was concluded at 5:30 p.m..

**American Samoa Coastal Management Program
312 Evaluation**

WRITTEN COMMENT RECEIVED AND RESPONSE

The following submitted written comments regarding the evaluation of the American Samoa Coastal Management Program:

E-Mail from James L. McGuire [P.O. Box 1180, Pago Pago, American Samoa, 96799] of a letter to Ryan Binns, Environmental Planner, ASCMP requesting information and response to questions related to the previous evaluation of the American Samoa Coastal Management Program from March 1997 through July 2000.

**American Samoa Coastal Management Program
312 Evaluation**

RESPONSE TO PREVIOUS FINDINGS

1) Program Suggestion: ASCMP should review its Federal consistency notice process to Federal agencies, make sure that all appropriate agencies addresses are correct, and ensure that appropriate agencies are provided opportunity to comment on proposed actions and are notified of Federal consistency determinations.

Response: This was done.

2) Program Suggestion: ASCMP is encouraged to continue to seek opportunities to work with Federal and Territorial agencies toward mutual benefit in the protection of American Samoa's resources. Clearly a "good faith" effort is warranted to coordinate a more stringent mechanism to protect cultural resources.

Response: This is being done.

3) Program Suggestion: The ASCMP should work to address legal issues as they evolve. A mechanism should be explored to allow ASCMP to cite and fine violators of permit conditions and those building without a permit. It would be preferable if the Administrative Law Judge review of cases did not have to be a "de novo" review. In any event a resolution to the "de novo" requirement for cases reviewed by the Administrative Law Judge should occur.

Response: This is ongoing.

4) Program Suggestion: Working with other agencies, ASCMP should address mutual issues of enforcement such as the development of documentary evidence, shared enforcement roles and joint permitting. The Enforcement Manual should be completed and "user friendly" documents, such as a step-by-step account of the process and what must be done, documents developed. ASCMP should also proceed with all its management options, such as compensatory mitigation, fee in lieu, and mediation to assure resource protection.

Response: The enforcement manual is still under development. However, issues regarding the Attorney General's office continue toward resolution. PRNS administrative rules were adopted.

5) Program Suggestion: Until there is confidence in the Territorial accounting system the current “draw-down” of funding should be maintained. Every effort should be made to provide NOAA Grants Management training to ASCMP and Treasury staff to continually update them on grant and financial management issues.

Response: This was done.

6) Program Suggestion: OCRM will work with ASCMP and the Governor’s Office to seek viable solutions to the salary issue.

Response: This is ongoing.

7) Program Suggestion: ASCMP should work to develop a coordinated approach to implementing the flood insurance program. First, with the support of the Governor’s Office, ASCMP should communicate the need for American Samoa’s participation in the National Flood Insurance Program (NFIP) to the other Territorial agencies and organizations responsible for implementation (department of Public Works, the Territorial Emergency Management Coordinating Office, and lenders). Second, an interagency NFIP implementation group should be established. Third, ASCMP should work closely with the Federal Emergency Management Agency to identify and secure sources of technical and financial assistance. OCRM will work with Federal agencies to enhance Federal/ASCMP coordination. Finally, monitoring, enforcement, and outreach programs for the NFIP should be developed and implemented..

Response: This was addressed.

8) Program Suggestion: At a minimum ASCMP should develop a proposal with UH that outlines training services and associated costs and submit it to the Marine Resources Pacific Consortium for funding consideration. The ASCMP should also take steps to institutionalize the training program for permit enforcement officers that lead toward some form of official certification. Further ASCMP is encouraged to work with UH to identify and develop additional training opportunities.

Response: This was addressed.

**American Samoa Coastal Management Program
312 Evaluation**

TABLE OF FINDINGS AND RECOMMENDATIONS

Evaluation Recommendations For: American Samoa
Evaluation Findings Issued: (Date)

The evaluation team documented a number of ASCMP accomplishments during the review period. These include:

Issue Area	Accomplishment
Operation and Management	Personnel - ASCMP staff is commended for the dedicated work they perform in managing American Samoa’s coastal resources.
Operation and Management	Ocean Symposium - ASCMP is commended for sponsoring the Ocean Symposium of May, 2005.
Operation and Management	Application of GIS and Computer Technology - ASCMP is commended for the significant strides made during the review period in the acquisition, development and use of computer technology for communication; protection and management of files; geographic information system applications supporting planning and growth management, economic development, shoreline change and land use planning; and, web-site development.
Operation and Management	2003 All Islands Meeting and Accord - ASCMP is commended for conducting the 2003 All Islands Meeting which led to the All Islands Accord.
Public Access	Outreach and Education - ASCMP is commended for its ongoing work and progress on outreach and education to promote public awareness regarding the critical and unique environmental, economic, and cultural values of American Samoa’s deep water, coastal, and watershed resources, as well as the mandate and functions of the program within the Territory.
Coastal Habitat	Sustainable Management and Protection of American Samoa Mangrove Forests - ASCMP is commended for its ongoing work in support of the research to sustainably manage American Samoa’s mangrove forests.
Coastal Habitat	Ocean Resources Management - ASCMP is commended for development and initial implementation of the Ocean Resources Management Plan.
Coastal Habitat	Coral Reef Activities - ASCMP is commended for its support of the Coral Reef Initiative through development and support of the Coral Reef Advisory Group.

In addition to the accomplishments listed above, the evaluation team identified several areas where the program could be strengthened. Recommendations are in the forms of Program Suggestions (PS) and Necessary Actions (NA). Areas for improvement include:

Issue Area	Recommendation
Operation and Management	Program Suggestion - Given the level of spatial analysis and other computer technology development in DOC it is time to consider hiring a qualified Information Technology person for the whole department. Also an in-house environmental or civil engineer might be considered. The vacant wetlands position should be filled as soon as possible.
Operation and Management	Program Suggestion - ASCMP needs to continue to conduct internal outreach and education within the various departments of DOC and with other key Territorial government agency partners on: (1) the mandate and functions of ASCMP and its role and position within the overall Territorial government structure; (2) the necessary partnership support and compliance required of DOC departments and other partner agencies to ensure the efficacy and success of ASCMP functions; and specifically, (3) the oversight and authority roles that ASCMP is designed to provide from within the American Samoa government. As a deliverable from such internal outreach and education efforts within DOC and partner agencies, the aforementioned Memorandum of Agreements should be revisited and reaffirmed by all parties and updated if necessary. A scheme for the development and execution of a communication strategy to maintain dialogue between the ASCMP and leadership at all levels needs to be thought out and implemented.
Operation and Management	Program Suggestion - ASCMP should develop an orientation program for new employees, both within the Department, and within the networked Departments. In developing such a program, consideration should be made regarding its use as a tool for public education in general. ASCMP should seek out opportunities to expand and use the capacity of its partners at and from the Federal and Territorial level.
Operation and Management	Program Suggestion - ASCMP should work with the networked agencies to develop and implement an approach to integrated monitoring and enforcement of program functions to ensure that permit conditions are fully met and to monitor for, document, and address unpermitted activities including, potentially, those mistakenly undertaken through American Samoa government agency action. A procedure to ensure ongoing monitoring at the village level which includes local public participation and community support also needs to be developed.

Coastal Hazards	Program Suggestion - ASCMP should work with the Federal Emergency Management Agency to rectify issues of perception and document its commitment to take protective measures needed within the mapped V-zones.
Government Coordination and Decisionmaking	Program Suggestion - ASCMP should consider, with the PNRS regulatory agencies, the development of a site plan certification program, including: training in the development of a site plan; certification of the training; development of a list of certified and trained individuals who do site plans; acceptance of site plans only from those on the list; and, quality control of the list so that after several faulty site plans are submitted, an individual is removed from the list until they receive more training and new certification. In instances where site plans are corrected in the field, a process to have the change communicated to the GIS needs to be created.
Government Coordination and Decisionmaking	Program Suggestion - ASCMP should assure that inconsistencies, whether real or apparent, in the application of the PNRS process not occur. The joint permitting process within DOC should move forward to full implementation. ASCMP should also revisit the ASCMP rules as part of the review of MOA's, firming up the site plan development process, and in support of other recommendations in this document.
Government Coordination and Decisionmaking	Program Suggestion - ASCMP should develop policies, rules and regulations for the identified SMA's and designate additional critical areas needing protection.