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Hafa Adai Mr. Kuriawa,

On behalf of the Bureau of Statistics and Plans (Bureau), I would like to thank you for the opportunity to review and respond to the draft 312 Evaluation findings of the Guam Coastal Management Program (GCMP), as transmitted via your letter dated November 8, 2017. The Bureau has completed its review and hereby provides the following comments by Program Direction, Program Administration, and Topical Focus Area.

Program Direction

The Bureau believes that the need for a strategic plan that identifies a clear vision and mission for GCMP that is grounded in the statutory authorities of the Bureau and guided by the relevant elements of the GCMP Final Programmatic Environmental Impact Statement will produce significant benefits for the program. Setting these parameters will be critical in framing partner meetings and input. More importantly, a clear vision will help avoid mission creep and work towards building a strong institution of coastal professionals.

The Bureau acknowledges that convening pre-application meetings can be a valuable tool to aid in strengthening the annual Cooperative Agreement workplan with NOAA. Meetings and subsequent grant tasks should be based on a sound GCMP vision, mission, and goals(s) that involve critical thinking that logically works toward addressing a problem, in which the outputs/outcomes can be evaluated in a meaningful way. The Bureau recommends that in addition to working with staff and partners, the Office for Coastal Management Coastal Specialist assigned to Guam should also be actively included in the development of the application. The Bureau concurs with the importance of convening meetings with natural resource agencies and/or stakeholders to discuss and identify various coastal issues, and ways GCMP can serve as a conduit to transfer information, and identify its niche in being a catalyst for improvement on coastal matters.

The institutionalization of GCMP within the Bureau and its mandates for land-use and natural resource planning by statute and Executive Order(s) provides an opportunity to add value to a multitude of programs, projects, and initiatives that can benefit from comprehensive planning. The Bureau concurs that the level of added value is directly related to GCMP staff's technical expertise. Technical training should build from basic understanding of land use and natural resource planning, as well as a strong understanding of the regulatory/planning landscape to a technical understanding of ecosystem functions and spatial analysis.

The Bureau acknowledges that marine biology is an important branch of science and that the Coral program is a vital resource that can assist in decision-making regarding activities that can affect this precious fragile area. Over the last year, GCMP has been including the coral program, particularly the long-term monitoring program in federal consistency reviews for projects that may affect our marine habitat and will continue to expand the utility of coral collaboration in the future. However, the Bureau reminds NOAA that a major conclusion of the Federal Commission on Marine Science, Engineering, and Resources, whose report *Our Nation and the Sea*, found that *"the primary problem in the coastal zone was a management problem with all the attendant problems that proper coastal management implies. It is true that the Federal, State, and local governments share the responsibility to develop and manage the coastal zone. In reviewing the situation, we concluded that effective management to date has been thwarted by the variety of Government jurisdictions involved at all levels of government...diffusion of responsibilities among state agencies and the failure of states to implement long-range plans."*

The Bureau acknowledges that aligning strategic activities guided by marine biology can help achieve better management of this sub-element of our resource policies on Fragile Areas, in so far as aligning strategic activities based on other sciences or disciplines such as geology, geography, meteorology, archeology, terrestrial biology/ecology, engineering, urban planning, political science, and law could achieve better management of our other resource policies. It is vital that any activity involving GCMP is complementary in helping achieve a common goal and does not create a situation where GCMP deviates from its core mission.

Program Administration

The Bureau acknowledges that the job classification specifications of the Planner series established in 1980 within the Government of Guam is inadequate and does not provide for the optimal recruitment of skilled and technical workers capable of performing at a high level. This is especially true for the Planner III and IV positions. The Bureau will work with the Department of Administration Human Resource Division to assess the long-term gain and or implications of adopting and or modifying the job classification specification appropriate for coastal resources management.

The Bureau will interpret the necessary action to "...establish a job description that gives the program manager supervisory authority over the entire staff." to mean "...establish or modify the job classification specifications that gives the Coastal Program Administrator supervisory

authority over the entire staff.” The Bureau is concerned with the January 31, 2018 timeline of this necessary action as drafting the job classification specifications can be accomplished within the timeline, but its approval and official establishment will depend on the processes dictated by the Guam Department of Administration’s Human Resource Division. Any changes to the GCMP staffing pattern as deemed necessary to be in compliance with Guam law will be coordinated with NOAA. The Bureau will correspond with NOAA on any anticipated delays in meeting this necessary action.

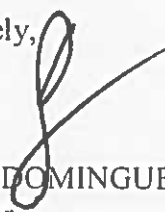
The Bureau concurs with the necessary action to establishing competencies in key coastal management issue areas and further concurs to establish a training plan and submit the requested performance measure data no later than January 31, 2018.

Topical Focus Area

The Bureau concurs with the recommendation to provide the leadership and staff to advance the Land Use and Capital Improvements master plan, and other territory plans to ensure storm water, climate adaptation, sea level rise, and coastal resilience are intergraded into the planning considerations.

This concludes the Bureau’s comments on the draft findings. Please do not hesitate to contact Mr. Edwin Reyes, GCMP Administrator at 475-9672 or myself at 475-9667 for any questions you may have.

Sincerely,



CARL DOMINGUEZ
Director