



OFFICE OF WATER
WASHINGTON, D.C. 20460

October 4, 2023

Ms. Darcy Young, Interim Executive Director
Narragansett Bay Estuary Program
235 Promenade Street, Suite 393
Providence, RI 02908

Dear Ms. Young:

Thank you, and the rest of the Narragansett Bay Estuary Program (NBEP) staff, as well as your many partners, for contributing to a successful 2023 Program Evaluation (PE) process. We recognize that everyone involved put considerable effort into both the PE package and the responses to our follow-up questions. We also appreciate your facilitation of the PE team's site visit that enabled the PE team to meet your staff and visit projects and people in your study area. The purpose of this letter is to provide the results of the Environmental Protection Agency's (EPA) 2023 PE which covers a review period from July 1, 2017 – September 30, 2022.

I would like to note that your evaluation benefited from the voluntary participation of Laura Blackmore, Executive Director of the Puget Sound Partnership (PSP), who served in an ex-officio capacity on the PE Team which also included Caitlyn Whittle from EPA Region 1 and Kathleen Kutschenreuter from EPA Headquarters. Ms. Blackmore's participation provided the PE team members with an invaluable National Estuary Program (NEP) perspective. Ms. Blackmore also shared information about the PSP that may be useful for your program and took several lessons learned back to the Partnership.

The primary purpose of the EPA PE process is to help EPA determine whether each of the 28 programs included in the NEP is making adequate progress implementing their Comprehensive Conservation and Management Plans (CCMPs). The evaluation process has considerably enhanced the EPA Headquarters and Regional knowledge of each NEP and promoted the sharing of innovative projects and approaches across all 28 NEPs. In addition, EPA uses the evaluation process to assess how the NEPs support Clean Water Act (CWA) programs and to demonstrate the extent of the NEPs' contributions to EPA 2022-2026 Strategic Plan Goal 5: Ensure Clean and Safe Water for All Communities, Objective 5.2, Protect and Restore Waterbodies and Watersheds.

The PE process uses a two-category determination of Proficient and Progressing, as defined in the 2021 NEP Program Evaluation Guidance. Proficient means an NEP is adequately meeting programmatic and environmental results. A Progressing determination means there are missing criteria that need to be

addressed before the next PE cycle. A Progressing determination will catalyze a timeline to address those missing elements or opportunities for improvement before the next PE cycle. This determination is informed by the entire PE package (narrative submission, NEPORT data, annual work plans, and EPA required annual end-of-year reports), on-site visit, and thorough discussions with the NEP.

The PE team has concluded that your program continues to make significant progress in implementing the NBEP's CCMP and has rated NBEP as Proficient for the 2023 PE. NBEP will receive continued support from EPA.

2023 Program Evaluation Findings

The following summary highlights the PE team's key findings by identifying the NBEP's: (I) Progress Made in the Areas Highlighted in the 2018 Program Evaluation, (II) Strengths, and (III) Opportunities for Improvement. This summary recognizes the program's successes and recommends efforts to further strengthen the program. The NEP's response to these recommendations will be evaluated in the next PE cycle in 2028.

I. Progress Made in the Areas Highlighted in the 2018 Program Evaluation Review

Program Implementation and Reporting – Outreach and Public Involvement

Establish an identity in the region and communicate this role to target audiences:

The 2018 PE Team identified the need to fill gaps not addressed by other entities in the region by redefining its vision, mission, and especially its services, to be truly additive to efforts to restore and protect the Study Area. NBEP has taken specific steps to engage more deeply with stakeholders and seek their involvement while further establishing its niche and value in the region. Accomplishments pursued to help the organization connect more directly with partners during this period included the development of a fact sheet/case statement, extensive outreach for "Vision 2032" (NBEP's next CCMP to be completed in 2024), rigorous partner expansion and diversification efforts, and assuring greater public access to the program's work. Further, story maps, science updates, and science events also targeted key and new audiences with NBEP-developed and branded products. The new Habitat Working Groups, Hundred Acre Cove Project, and NBEP's Blackstone River place-based projects also helped reach new people with services and brand. The action most responsive to this challenge was NBEP shifting from the New England Interstate Water Pollution Control Commission to Roger Williams University as its host in September 2021. It soon thereafter approved bylaws in March 2022 that established responsibilities across the partnership, including the host.

Expanded – but targeted - stakeholder representation and partners to help implement specific CCMP goals:

The 2018 PE identified the need to assess outreach target objectives (i.e., implementing CCMP goals) and outreach benefits to target audiences by placing greater emphasis on tailoring stakeholder group messaging. The strategic expansion of NBEP's partner outreach and other accomplishments noted above responded to this challenge of messaging content and reach.

Communicating program successes:

The 2018 PE Team also identified as a challenge the need for NBEP to better communicate the program's successes to help facilitate useful partnerships, including with potential funders. NBEP's first

fact sheet includes a summation of program successes over the years. The program's quarterly program reports and other parts of NBEP's website, a new newsletter launched in summer 2023, and its current Program Evaluation narrative all speak to NBEP's successes in the region.

Program Implementation and Reporting – Financial Management

Develop - and implement – an effective finance plan:

NBEP plans to create a finance plan after the release of Vision 2032 in 2024 that explores how to diversify NBEP's funding and fund the new CCMP over the next decade. The 2018 PE letter suggested that as a part of the finance plan, the program consider the feasibility of new options/approaches to financing program operations (that do not threaten partner relationships) while being consistent with the elements described in EPA guidance (National Estuary Program Comprehensive Conservation and Management Plan Revisions and Updates Guidelines, October 2020). Though funding from EPA will remain vital to the program, funding diversification and cost reduction measures could help maintain project activities over multiple years and allow for capacity-building through new staff hires and training.

Document primary leveraging more accurately:

In 2018, the PE Team urged NBEP urged to be more explicit and precise with tracking and reporting primary leveraging in NEPORT and via other means. As acknowledged in the 2018 Program Evaluation, NBEP's niche has been on pre-construction work and green infrastructure construction. NBEP funding and non-federal match did support habitat construction projects during this period, and they are represented in NEPORT. NEPORT reporting does not yet reflect NBEP's full impact in the Study Area.

While the \$1.7 million reported as leveraged in NEPORT is an improvement from past periods, the program knows it leverages vastly more money. Receiving sufficient and timely information from partners on their non-NBEP-funded projects to complete the required fields in NEPORT has been another confounding factor. NBEP hopes that by more broadly and deeply engaging partners (by providing them no-cost technical services, including them in planning processes, and funding their work), they will see value in the reporting and be more inclined to respond to NBEP requests. NBEP understands the value of NEPORT reporting for justifying the NEP and its work and commits to continue exploring means to capture more projects in its region. It hopes that hiring an ecologist in 2024 will increase NBEP's capacity to deepen its engagement with restoration-focused partners and contextualize requests for information on habitat projects funded by other entities.

Technical Assistance and Capacity Building

Work with other NEPs and related place-based programs on an issue-specific basis:

The 2018 PE Team recommended that NBEP work more closely with other NEPs and place-based programs to identify issue-specific areas for collaboration and mutual assistance to potentially multiply programmatic impacts and build internal capacity in areas of common interest. Throughout the evaluation period, NBEP has collaborated with NEPs and place-based programs regularly across the nation. NBEP has partnered with the Casco Bay Estuary Partnership on coastal flooding data analysis, Mass Bays Estuary Program and the Long Island Sound Study on seagrass propagation, Buzzards Bay National Estuary Program on Southeast New England Program (SNEP) related activities, Peconic Estuary Partnership and Coastal & Heartland National Estuary Partnership regarding host change, Indian River Lagoon National Estuary Program on collaborative governance workshops, Tampa Bay Estuary Program (TBEP) on environmental justice mapping, and the Lower Columbia Estuary

Partnership on their FY2020 Program Evaluation as the ex-officio. The program engaged with all NEPs via the Association of National Estuary Program (ANEP), especially once the Program Director began serving as ANEP Secretary in 2022. Through a contract with Coastwise Partners, NBEP worked closely with former TBEP and Chesapeake Bay Program directors on Vision 2032. The program consulted with countless place-based programs, large and small, in New England and via the Program Director's connections with organizations and leaders in the Chesapeake Bay watershed and across the US West.

II. Strengths

It is worth noting that NBEP's work seeks to deliver benefits to the triple-bottom line of environment, economy, and community. The NBEP's accomplishments during this evaluation period illustrate the program's transition over five years from its roots as a funder of research and restoration to a more collaborative, interdisciplinary, and nimble body that provides a range of niche services and financial support to projects that respond to local needs across the Study Area.

Healthy Ecosystems

Over the program review period, NBEP has demonstrated strong regional leadership in forming and managing habitat working groups: Salt Marsh Restoration, Assessment, and Monitoring Program (RAMP), Submerged Aquatic Vegetation (SAV) Working Group, and the Fisherman's Ecological Knowledge Working Group. NBEP convened diverse interests to advance the Lower Blackstone and Pawtuxet Fish Passage Projects, partnered on Rhode Island Salt Ponds related monitoring and outreach, and developed a story map titled Recovery of the Sea Floor highlighting the benthic community as the backbone of the bay's ecosystem. NBEP funded causeway repair construction as well as salt marsh runnel construction and revegetation to reduce impounded water, and locally based comprehensive watershed assessment and restoration planning.

Clean Waters

NBEP has demonstrated significant progress towards documenting and relaying nutrient load reductions from Wastewater Treatment Facilities (WWTF) upgrades (tertiary treatment) in the estuary. For example, NBEP supported the release of reports using scientific analysis and paired them with simple messaging to demonstrate that efforts to clean the Narragansett Bay that ramped up 20 years ago (after the Greenwich Bay Fish Kill) have worked. NBEP established the Water Clarity Working Group to reassess Narragansett Bay water clarity conditions considering the WWTF upgrades, consider different measurement tools, and explore if water clarity data could be used in management decisions. NBEP also summarized three complex studies on atmospheric nitrogen deposition in the Narragansett Bay to produce key findings pointing to the need for further assessment to inform the role that increasing ammonia is playing in bay phytoplankton blooms and urban air quality. This work can eventually lead to more accurate nutrient budgets and responsive policy action. In addition to NBEP's extensive work in the nutrient, sediment, and pathogen reduction arena, it has actively supported an extensive host of water quality-related studies, tools, plans, action (including a micro and macro plastics tech transfer event), and outreach. Particularly notable is NBEP's dedication to supporting municipalities and partner organizations (coastal planners, homeowners, etc.) to analyze, plan, and better manage storm inundation risk and runoff via green infrastructure and stormwater improvement construction and performance evaluation.

Strong Communities

Throughout the evaluation period, NBEP worked hard to strategically engage new communities through hundreds of one-on-one meetings, expanding and diversifying partnerships outside its traditional circle. Its Steering Committee added new representation from municipalities, fishing, health, transportation, and community groups, mid-level professionals across interests, and the public while maintaining a nearly balanced membership across Rhode Island and Massachusetts. Since late 2020, NBEP has operated a new website that undertook a refresh to add numerous resources and provided greater public access to the program's work. Land Use and Nuisance Flooding updates and Story maps can also be found on this refreshed and expanded platform. NBEP convened a Social Science Working Group to explore potential ways to document data needs and what social science indicators and framing are best to help inform environmental decisions and create resources specific to the region (Environmental Justice Planning and Mapping Tool and Environmental Justice in the Narragansett Bay Region Story Map) that enabled identification of environmental justice areas and exploration of the distribution of benefits and burdens in these areas to support better understanding of what environmental justice means in their region. The Program also sought contract support to conduct a Diversity, Equity, Inclusion, and Justice Assessment that resulted in NBEP's commitment to specific actions to help address environmental justice in its region. In FY2020 and FY2021, NBEP and EPA completed a pioneering geospatial analysis of coastal public access and community demographics in the Narragansett Bay region. The creation of the Blackstone Watershed Collaborative, Blackstone Commons Project, and the Community Engagement Payments Program further demonstrated NBEP's dedication to strong communities.

NEP Administration and Governance Structure

During the review period, NBEP achieved a transition to a new host entity, Roger Williams University. NBEP demonstrated remarkable balance and a successful approach to CCMP implementation thanks to talented staff, appropriate programming, and diverse partnerships. NBEP is seen as a leader in watershed management and has a reputation for being a reliable and impartial source of information. The NEP showed commendable leadership under extenuating circumstances to implement its CCMP while being sensitive to organizational and community needs. The Program demonstrated flexibility, adaptability, and resilience during the COVID-19 pandemic, extreme weather events, staff turnover, etc.

III. Opportunities for Improvement

NEP Administration and Governance

EPA encourages NBEP to celebrate the successful placement of the program on a firm foundation and build on this success as the program stabilizes itself and moves forward. Completing the CCMP (Vision 2032) in 2024 will serve as an important opportunity to focus program priorities and set the program up for success for years to come. **Once Vision 2032 is adopted, NBEP should work with the Management Conference to seek out innovative ways to implement the CCMP, including but not limited to, building capacity within the NBEP and partner organizations.** We are pleased with NBEP's intention to develop a finance strategy and implement it once Vision 2032 is in place in 2024. **We encourage NBEP to use BIL funds effectively and efficiently to help partners develop and implement projects to achieve social, ecological, and environmental justice goals.**

NEP Ecosystem and Community Status

While NBEP is making great strides to catalyze conversations about developing collaborative goals for ecosystem and human wellbeing priorities across the region, **we encourage NBEP to expand and deepen this goal-setting effort and connect with other NEPs to discuss lessons learned about setting goals (i.e., numeric water quality and habitat-related goals).** Collaborative goal development across the geographic region will create a foundation from which tracking systems to better tell the story of progress, opportunities, and challenges can then be established.

Assessment and Monitoring

The monitoring-related actions proposed for Vision 2032 are intended to organize data, build drivers, create buy-in for more strategic monitoring, and determine whether a regional monitoring plan is additive. In 2022, NBEP began conversations with the URI Coastal Institute to re-invigorate the Rhode Island Environmental Monitoring Collaborative and establish similar forums across state lines. NBEP is also involved in the SNEP Indicators and Metrics effort to establish and coordinate regional monitoring priorities. **We recommend that NBEP continues to explore more holistic and strategic monitoring by compiling and sharing regional data, creating numeric goals that span boundaries, establishing systems to track and respond to progress, and seeking funding for the staff to manage such programs.** Consistent with FY 2023 Workplan implementation, NBEP plans for the Staff Scientist and its new Ecologist hire to better track the outcomes of work funded by the program (or offered as match) and assume a greater role in coordinating and prioritizing monitoring work across the region.

Closing

Thank you again for participating in the PE process. We welcome any additional thoughts or suggestions you may have either about the evaluation process itself or about EPA's involvement in the implementation of the NBEP's CCMP. If you have any questions or comments, please contact me at 202-566-1293 or Kathleen Kutschenreuter at 202-566-1383 or through electronic mail at kutschenreuter.kathleen@epa.gov.

Sincerely,

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cc: Brian Frazer, Director, Office of Wetlands, Oceans and Watersheds, U.S. EPA
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