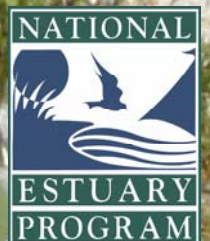# National Estuary Program
2004-2006 Implementation Review Report

June 19, 2008

National Estuary Program
2004-2006 Implementation Review Report

Table of Contents

List of Tables

List of Figures

Cover and back page photo by:
Karen Young, Casco Bay Estuary Partnership

National Estuary Program
2004-2006 Implementation Review Report

Section I. Introduction

The National Estuary Program (NEP) is the U.S. Environmental Protection Agency's (EPA) flagship national watershed program. The NEP is authorized and funded through §320 of the Clean Water Act (CWA). The NEP uses locally-based collaborative decision-making to prioritize and protect coastal and estuarine resources in 28 different locations in the continental U.S. and Puerto Rico.

This report summarizes NEP accomplishments documented during EPA's Implementation Reviews (IRs) of the 28 NEPs during 2004-2006. The EPA conducts IRs of the 28 programs included in the NEP to determine progress implementing their respective Comprehensive Conservation and Management Plans (CCMPs), and continued eligibility for funding under §320 of the CWA. EPA has established and maintained an IR for each NEP every three years that carefully assesses the accomplishments and challenges facing each NEP. The comprehensive IR includes a detailed report submitted by each NEP, an on-site visit by a team of EPA headquarters and regional staff, and a final determination of eligibility for continued funding. As a result of the IR process, recommendations for management changes are provided, as needed, and then revisited as part of the NEP's next IR. These recommendations have resulted in significant and important changes in program management, and are the basis for reporting program accomplishments. This report also discusses the new Program Evaluation (PE) Guidance released by EPA in September 2007 which is being used for the 2008-2010 IRs.

EPA has been successful in monitoring and assessing each NEP's progress toward its watershed goals despite the different challenges facing each estuary. Some of these challenges include diversity of size, geography, location, and demographics among the NEPs; different and similar watershed pressures, priorities, and indicators; and decentralized, locally-based decision-making. As such, each NEP tells a unique story about watershed protection. EPA combines and summarizes these stories into a national NEP story about coastal watershed protection best management practices (BMPs) and environmental results. Many of the lessons learned from the IR process have been used by EPA to develop tools to help strengthen nationwide watershed protection efforts; to increase watershed protection capacity nationwide through transfer of technical information amongst federal, state, local and tribal watershed partners; and to influence the direction of policy at the national and local level.

Section II. Purpose and Background

A. Purpose

This report summarizes the results from EPA's IRs of the 28 individual NEPs conducted during 2004-2006. This report includes:
- An overview of the 2004-2006 IR process.
- Indicators of NEP progress, including habitat protected and restored and dollars leveraged from §320 of the CWA funding.
- Examples of NEP support of CWA core programs.

- Common strengths and challenges among the NEPs.
- Utilization of the IR process as an EPA and NEP management tool.
- A brief description of the 2007 NEP Program Evaluation (PE) Guidance.

B. Background

Each of the 28 NEPs develops and implements a CCMP that establishes priorities for protection of local estuarine resources. Each NEP's CCMP is based on a scientific characterization of the estuary and is developed and approved by a broad-based coalition of stakeholders. Each CCMP is approved by the EPA Administrator. Development of the first CCMP began in 1987. The NEPs have formally entered the Program from as early as 1991 to as late as 2002.

The EPA conducts IRs of the 28 programs included in the NEP to determine progress implementing their respective CCMPs, and continued eligibility for funding under §320 of the CWA. Continued funding for each NEP under §320 of the CWA is contingent upon Congress appropriating sufficient funds to the EPA for the purpose of implementing the NEP. The purpose of the IRs is not to rank or compare the NEPs.

The IR process has been continually adapted through the years to address the dynamic nature of program management and evaluation needs. The EPA began conducting NEP IRs on a biennial basis in 1997. The 2000 IR Guidance streamlined the process, and the review cycle was extended from every two to every three years for the NEPs that had already undergone the biennial review. Programs that had not yet undergone the biennial review by 2000 were required to submit a more complete package to EPA and undergo a more extensive review. The 2004 IR Guidance was designed to improve the efficiency of the reporting process, yet still collect sufficient information to evaluate NEP progress and to achieve technical transfer of lessons learned. The IR schedule continued on a triennial cycle (each NEP was reviewed once during 2004-2006).

In addition to assessing the CCMP implementation progress and eligibility for continued funding, the IRs are a valuable tool for:
- Highlighting environmental results.
- Highlighting strengths and challenges in program management.
- Demonstrating continued stakeholder commitment.
- Transferring lessons learned within EPA, among the NEPs, and with other watershed programs.
- Assisting EPA in making resource allocation decisions to strengthen each NEP.

Section III. Overview of the 2004-2006 Implementation Reviews

A. 2004-2006 NEP IR Schedule

The 2004 IR Guidance, released by EPA in December 2003, established a three year review schedule staggered by NEP "Tiers." The Tier approach (Tiers I-V) was used as a way to categorize the NEPs undergoing review by the time of entry into the national Program. Tier I represents the first NEPs to enter, Tier II the second, and so on. See **Table 1** for the 2004-2006 IR Schedule based on the Tier system. Tiers III and IV went through review in 2004, Tiers I and II in 2005, and Tier V in 2006.

Table 1: 2004-2006 IR Schedule

Tiers III and IV IR: 2004 (9 Programs)	Tiers I & II IR: 2005 (12 Programs)	Tier V IR: 2006 (7 Programs)
Barataria-Terrebonne	Albemarle-Pamlico Sounds	Barnegat Bay
Casco Bay	Buzzards Bay	Charlotte Harbor
Coastal Bend Bays	Delaware Inland Bays	Columbia River
Indian River Lagoon	Galveston Bay	Maryland Coastal Bays
Massachusetts Bay	Long Island Sound	Mobile Bay
Peconic Bay	Narragansett Bay	Morro Bay
San Juan Bay	New York / New Jersey Harbor	New Hampshire Estuaries
Tampa Bay	Partnership for the Delaware Estuary	
Tillamook Bay	Puget Sound	
	San Francisco Estuary	
	Santa Monica Bay	
	Sarasota Bay	

B. IR Submission, IR Team Review, and Final Letter

The NEPs submitted a narrative summary and supporting documentation for ten IR elements related to organizational capacity and program management toward their CCMP goals. These elements, listed in the order they were cited in the 2004 IR Guidance, included:

- The NEP Annual Work Plan
- Ecosystem Protection Projects
- Tracking and Reporting on Progress
- Indicators and Monitoring
- Funding
- Stakeholder Involvement
- Technical Assistance to Communities
- Organizational Structure
- Education and Outreach
- Emerging Issues

Each IR was conducted by an IR Team. The IR Team consisted of a lead headquarters staff person (a headquarters NEP coordinator), a second headquarters reviewer (the headquarters NEP coordinator for the program being reviewed), an EPA regional reviewer (the regional NEP coordinator for the program being reviewed), and an additional EPA regional reviewer (a regional NEP coordinator). In some cases, the IR Team included an ex-officio NEP Director who volunteered to serve on the IR Team.

Each IR Team conducted a qualitative evaluation of the materials submitted by each NEP, conducted an on-site visit, and made a final determination of a "pass/fail" rating. Programs were not ranked or compared against one another. EPA provided each NEP with an IR Final Letter that included the final rating and details about program strengths and challenges, and recommendations for improvement.

For the 2004-2006 IRs, 27 programs "passed" and one program received a "conditional pass." For the program that received a "conditional pass," EPA provided recommendations for improvements, including timeframes, as needed.

Section IV. 2004-2006 National Estuary Program IR Findings

This section summarizes findings from the 28 IRs. To provide some context, each NEP has its own indicators of progress that it uses to report locally about environmental progress. These indicators, found in such documents as *State of the Bay* reports, are reviewed by IR Teams to assess progress at the local level. For the purpose of this report, two indicators common to all NEPs and for which EPA has been collecting data will be discussed: habitat protected and restored, and dollars leveraged from §320 of the CWA funding. In addition, the EPA gathers examples of how the NEPs support the implementation of the CWA core programs in their watershed protection efforts.

Also, this section describes the common NEP organizational capacity and program management strengths and challenges. It is EPA's belief that strong organizational structures will lead to scientifically sound and sustainable watershed protection decisions. The identification of these common strengths and challenges has played a key role in program management at the federal and local level.

A. Environmental Results

The NEPs and their many federal, state, and local agency partners implement plans to protect and restore critical habitat. Their efforts have produced on-the-ground, measurable environmental results that have improved water quality, provided erosion and flood control, and protected and restored habitat for living resources. Some of their efforts include creating artificial reefs, planting riparian buffers, acquiring uplands for open space, and reconnecting tidal flow to wetlands.

Results from the reporting years covered in the 2004-2006 IRs, which include only 2001-2005 data, show that the NEPs and their partners restored and protected just over 518,000 acres. **Figure 1** displays the results by habitat type.

Figure 1: Acres Protected and Restored by Habitat Type
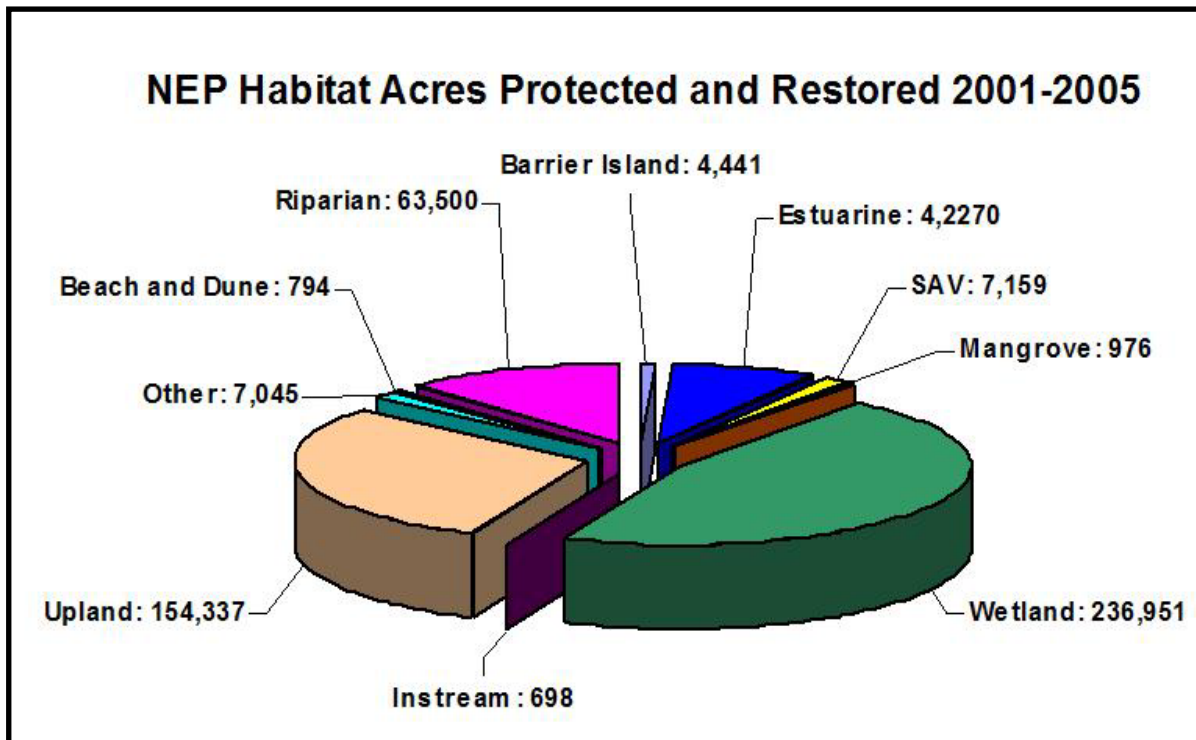

NEP Habitat Acres Protected and Restored 2001-2005

- Barrier Island: 4,441
- Riparian: 63,500
- Estuarine: 4,2270
- Beach and Dune: 794
- SAV: 7,159
- Other: 7,045
- Mangrove: 976
- Upland: 154,337
- Wetland: 236,951
- Instream : 698

Table 2 defines the habitat types identified in **Figure 1**.

Table 2: Definitions for Habitat Types

Habitat Category	Descriptions
Barrier Island	Piece of land, usually elongated and somewhat parallel to the mainland shoreline, which is separated from the mainland by a body of water open to the ocean, and which has a non-marsh dry interface (such as sand or rock) with the ocean.
Estuarine	Intertidal areas, mudflats, shellfish beds, and bay shoreline.
Submerged Aquatic Vegetation (SAV)	Marine plants, including seagrasses.
Mangrove	Subtropical to tropical trees or shrubs that have the common trait of growing in shallow and muddy saltwater or brackish waters, especially along quiet shorelines and in estuaries.
Wetland	Freshwater marsh, bogs, and pocosins, as well as intermediate, tidal, and coastal marshes.
Instream	Aquatic habitat within stream banks.
Upland	Agricultural, forested, or open-space areas that do not fall into one of the other categories and have been included in NEP watershed restoration efforts.
Beach and Dune	Mounds and/or sand ridges deposited by the wind.
Riparian	Plant communities contiguous to and affected by surface and subsurface hydrologic features, such as rivers, streams, lakes, or drainage ways.

B. Leveraging

The NEPs successfully leverage federal seed money to support the implementation of their CCMPs. The NEPs obtain these funds by building relationships with a diversity of federal, state, local, and private partners. The NEPs may play a "primary," "significant," or "support" role in leveraging additional resources. Results from the reporting years covered in the 2004-2006 IRs, which include data from 2003-2005 only, show that the NEPs played a primary role in leveraging $513 million for a ratio of $10 for every $1 of EPA §320 grant funds provided. The NEPs leveraged $1.70 billion dollars when all the roles were combined. **Figure 2** illustrates the amount of dollars leveraged by roles as compared with the amount of funds from §320 of the CWA and congressional earmarks. Funds leveraged by the NEPs help to protect and restore hundreds of thousands of acres of habitat and to reduce point and nonpoint sources of pollution.

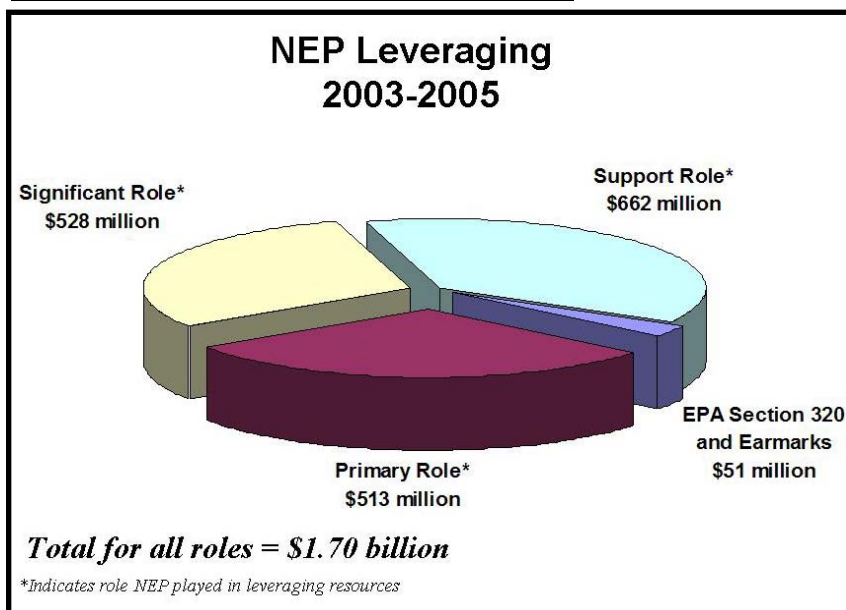Figure 2: Funds Leveraged by NEP Role

Table 3 provides definitions and examples of the different roles the NEPs have played in leveraging additional resources.

Table 3: NEP Leveraging Roles with Examples

Role	Definition	Examples
Primary	*The NEP plays the central role in obtaining leveraged resources.*	• Convening a workgroup that created a storm water utility. • Writing a grant proposal that helped fund the implementation of a CCMP action. • Soliciting funds and in-kind support for NEP operations (e.g., office space). • Providing funds to partners for use as match for grants that fund the CCMP implementation.
Significant	*The NEP actively participates in, but does not lead the effort to obtain additional resources.*	• Writing parts of a grant proposal or identifying lands for habitat restoration. • Identifying lands for habitat restoration that were restored using other sources of funding. • Directing other non-NEP resources (e.g., SEP money) to projects. • Establishing a program such as a local land trust that raised money for the CCMP implementation. • Convening or actively participating in a storm water utility workgroup that subsequently raised funds for the CCMP implementation. • Providing seed money to support a larger project, e.g., a public event.
Support	*The NEP plays a minor role in channeling resources toward the CCMP implementation.*	• Writing a letter of support for a partner grant application or including habitat acquisition as a CCMP action, while other entities raised funds and identified lands for acquisition. • Wring a letter in support of a partner's grant proposal. • Including habitat acquisition as a CCMP action, while other entities raised funds and identified lands for acquisition.

C. NEPs Support CWA Core Programs

The 2004-2006 IRs also served as an effective tool for collecting data illustrating the NEPs' role in supporting CWA core programs. Results are displayed, listed in alphabetical order by CWA core program[1], in **Table 4**. **Table 4** includes actual examples identified in the 2004-2006 IR submissions and included in the IR Final Letters[2].

---

[1]*The CWA core program Sustainable Wastewater Infrastructure is not included in **Table 4** because during the time period covered in this report no NEPs reported support of this CWA core program.*

[2]*In 2004, EPA was not formally collecting information from the NEPs regarding their support of CWA core programs. However, EPA identified NEP CWA support from the 2004 IR submissions.*

Table 4: NEPs Support CWA Core Programs: Examples Identified in the 2004-2006 IR Final Letters

CWA Core Program	# of NEPs	Examples
National Pollutant Discharge Elimination System (NPDES) / Storm Water	9	• Sponsoring or co-sponsoring Phase II Municipal Storm Water training workshops. • Utilizing outreach and education efforts to inform the public about NPDES permits. • Providing grants for storm water implementation activities.
Non-Point Source (NPS)	9	• Assisting states and municipalities in securing and implementing §319 grants. • Promoting smart growth practices across the watershed. • Utilizing outreach and education efforts to inform the public about storm water watershed-friendly landscaping practices.
Total Maximum Daily Loads (TMDLs)	15	• Developing a trash TMDL, which was the first of its kind in the nation. • Working with states and municipalities to develop TMDL requirements. • Utilizing NEP monitoring data to initiate new TMDL development and evaluate existing TMDLs.
Water Quality Monitoring (WQM)	14	• Developing environmental indicators and monitoring programs to study long-term ecological trends. • Building successful volunteer monitoring networks to aid in sustained water quality monitoring.
Water Quality Standards (WQS)	4	• Providing expert review and comment on the state's 303(d) documents, as well as proposed changes to state's water quality standards. • Identifying impaired water segments by comparing their monitoring data with established water quality standards.
Wetlands	7	• Identifying priority wetlands for restoration. • Enhancing wetlands to improve flood management. • Using geographic information systems (GIS) to map wetlands in the NEP watershed and making the GIS maps available on-line.

D. Common Strengths and Challenges

The common strengths and challenges identified in the 2004-2006 IRs were categorized by the ten elements outlined in the 2004 IR Guidance and are displayed in **Table 5** and **Table 6**, respectively. The elements are listed in the tables in the order they were cited in the 2004 IR Guidance. Both tables include examples identified in the 2004-2006 NEP IR submissions and included in the IR Final Letters. The strengths and challenges are difficult to analyze in a systematic way due to the qualitative nature of the IR process used in 2004-2006. Further, the same element may be considered a strength for some NEPs and a challenge for others, and/or simultaneously considered a strength and challenge for the same NEP. Nonetheless, EPA assessed general strengths and challenges, and made decisions about extramural resources to help address NEP challenges. Overall, EPA can summarize results in terms of *Ecosystem Protection Projects* and *Education and Outreach* as consistent strengths, and *Funding* and *Organizational Structure* as consistent challenges among the NEPs.

Table 5: Common Strengths Identified in the 2004-2006 IR Final Letters

Common Strengths	# of NEPs	Examples
NEP Annual Work Plan	--	*This element surfaced as a challenge for some NEPs (see **Table 6**). It is only displayed in the strengths section for consistency between **Table 5** and **Table 6**. The elements in the tables are listed in the order they were cited in the 2004 IR Guidance.*
Ecosystem Protection Projects	20	• Reducing pollutants from storm water runoff. • Protecting and restoring important habitat (e.g., revegetation programs, mapping of critical areas and efforts to protect manatees, salmon and other wildlife). • Developing web-based tools and strategies for habitat protection.
Tracking and Reporting on Progress	3	• Good CCMP implementation tracking system allowing public feedback. • Collecting data to compare current bay conditions to historic conditions. • Hosting State of the Bay Conference and then publishing a *State of the Bay* Report.
Indicators and Monitoring	15	• Creating an inter-agency cooperative coastal monitoring network that features monthly monitoring of different physical and chemical parameters. • Establishing volunteer monitoring programs. • Developing a suite of indicators relevant to the estuary's priority problems.
Funding	9	• Establishing a state budget line-item for a shellfish program. • Using partnership dollars to leverage funds for the NEP to implement restoration projects. • Adopting a long-range Finance Plan.
Stakeholder Involvement	12	• Undergoing a rigorous assessment of its advisory structure resulting in the creation of focused "teams" aligned with primary CCMP goals; teams will work to increase more meaningful stakeholder involvement. • Empowering citizens to craft a new county plan through educational workshops and meetings with strong leadership from the NEP's Citizens Advisory Committee (CAC). • Engaging business entities in adopting conservation practices.
Technical Assistance to Communities	8	• Assisting local communities on issues such as storm water, land use, and septic system maintenance. • Conducting third party permit review of local water districts and State Department of Transportation. • Sponsoring technical conferences (e.g., storm water and marine invasion).
Organizational Structure	12	• Successfully embracing new status as a non-profit by establishing a clear identity and successfully raising its profile in the community. • Restructuring the Management Committee resulting in extremely active program leadership which completed a new set of deliverables for the NEP. • Adding staff to the program to oversee specific areas (e.g., habitat restoration and monitoring activities).
Education and Outreach	17	• Providing minority high school students with the opportunity to conduct hands-on field and laboratory experiences in the NEP study area. • Hosting National Estuaries Day Live Broadcast. • Developing educational and outreach products such as newsletters, calendars, and websites.
Emerging Issues	5	• Developing a new action plan addressing groundwater and surface water use. • Updating the CCMP to address biological production loss resulting from water diversions and invasive species. • Promoting smart growth concepts and tools.

Table 6: Common Challenges Identified in the 2004-2006 IR Final Letters

Common Challenges	# of NEPs	Examples
The NEP Annual Work Plan	3	• Accurate reporting and distinguishing between new vs. on-going projects. • Highlighting and describing achievements from previous year's work plan. • Need for specificity (e.g., hard to determine what organization is conducting which monitoring activity relative to the cost indicated in the work plan).
Ecosystem Protection Projects	8	• Developing and implementing a comprehensive dredged materials management plan. • Need to take a stronger leadership role in ecosystem restoration within the area. • More efforts to implement a pathogen management plan in order to reopen closed shellfish beds.
Tracking and Reporting on Progress	11	• Continuing development of Environmental Report Card. • Including information on environmental progress and results from the implementation of the monitoring plan by publishing documents and/or placing environmental data on the program's website. • Reassessing the existing CCMP implementation tracking system.
Indicators and Monitoring	12	• Identifying the appropriate indicators that will be useful to the NEP as well as the public. • Updating monitoring plan that identifies data gaps and secures funding for any needed monitoring. • Increasing coordination with statewide monitoring strategy to develop program-specific measures and indicators.
Funding	18	• Incorporating long-term funding opportunities in the Finance Plan vs. only short-term grants and contracts. • Obtaining dedicated funding or explicit in-kind support from state, county, or special district government. • Developing an extended network of organizations that can contribute to projects and share implementation cost.
Stakeholder Involvement	5	• Diversifying the constituent base in the decision-making process to maintain stakeholder involvement by exploring non-traditional outreach partnerships and conducting workshop(s). • Seeking additional opportunities to reach out to the local community since program faces continuous challenge of having a large study area, competing with many environmental groups, and having limitations due to being housed in a state agency. • Providing opportunities for the public and stakeholders to voice their concerns and provide feedback to the program.
Technical Assistance to Communities	1	• Maximizing regional learning and transferring successful initiatives to other communities.
Organizational Structure	16	• Establishing a formal governance management structure that brings together diverse stakeholders. • Working more closely with state agency to expedite hiring of a Program Coordinator to effectively address the CCMP goals. • Having a Memorandum of Agreement that specifies the roles and responsibilities of all parties that constitute the program.
Education and Outreach	4	• Providing educational opportunities to the constantly shifting transient and tourism-based population in the program. • Targeting non-English speaking population. • Developing an outreach strategy.
Emerging Issues	9	• Addressing population growth and development. • Implementing Total Maximum Daily Loads (TMDLs) by playing role in helping communities set strategies for necessary nutrient load reductions. • Updating the CCMP and redefining priorities.

Section V. The IR Process as a Management Tool

Managing environmental programs, whether they are regulatory or non-regulatory, pose inherent challenges due to the many known and unknown factors that influence the state of the environment. The IR process has proven to be a successful management tool for the purposes of grant requirements and funding decisions; for improving EPA's ability to manage the national Program; and for fostering adaptive management and BMPs within the NEPs. The following are examples of how EPA and the NEPs use the IR as a program management tool.

EPA Program Management
- EPA was able to make decisions regarding FY 2005, 2006, and 2007 NEP funding.
- EPA was able to document habitat protected and restored and leveraging data as national indicators of progress.
- EPA was able to identify and document environmental protection progress related to the common NEP management issues in the relevant NEPs. These issues are nutrient overloading, toxic chemicals, habitat loss and degradation, pathogens, decline in fish and wildlife populations, alteration of natural flow regimes, natural resource valuation, and introduced species.
- EPA was able to document examples of how the NEPs are supporting CWA core programs.
- By identifying and documenting NEP challenges, EPA was better able to invest its resources to help improve the performance of the NEPs. The following are examples of EPA's support for different challenges:
    - Finance workshops and on-site finance planning assistance.
    - Volunteer monitoring workshops.
    - Indicator development workshops.
    - *Indicator Development for Estuaries* (manual to assist the NEPs and other estuaries in developing their suite of indicators).
    - Competitive grants addressing aquatic invasive species, smart growth, and communication strategies.
- The EPA used the IR process as a means for documenting program management and oversight under the Office of Management and Budget (OMB) reporting requests for the Program Assessment Rating Tool (PART) in 2005.

NEP Program Management
- The NEPs were able to document and report local environmental protection progress and results to EPA.
- The NEPs were able to report to EPA on national program priorities.
- The NEPs used feedback gathered from the IRs to make improvements or refinements to their programs (adaptive management).
- The NEPs were able to transfer lessons learned from their watershed management and implementation reviews to other NEPs and other community-based watershed efforts.

Section VI. 2007 NEP Program Evaluation Guidance

Based on the dynamic nature of watershed protection, the increasing sophistication of the NEPs, and increasing government accountability, the 2004 IR Guidance was reassessed upon completion of one cycle of reviews. An IR Reassessment Team composed of EPA headquarters staff, EPA regional NEP coordinators, NEP Directors, and National Oceanic and Atmospheric Administration (NOAA) partners worked in a collaborative manner to develop the new NEP Program Evaluation (PE) Guidance which was released by EPA in September 2007.

The goals of the new PE Guidance are:
- To increase the objectivity and consistency of PEs among the different NEPs.
- To further align the PEs with the individual NEP CCMP priorities and related NEP annual work plans.
- To measure progress in achieving programmatic and environmental results over the short-term, intermediate, and long-term stages of progress.
- To better document reductions and/or changes in pressures on coastal watersheds.

The new PE Guidance includes state-of-the-art program evaluation methodology that will ensure an emphasis on environmental results, objectivity, and transparency. Further, administrative burden was reduced by aligning the PE more with NEP work plans and reducing the required documentation based on materials already submitted to EPA. Some of the new features include:
- A logic model that incorporates the pressure-state-response framework.
- Pre-selected performance measures and a four-tiered rubric for programmatic activities.
- Narrative summary of NEP work plan goals discussed in the context of the logic model.
- An on-site visit.
- Articulated rating thresholds.

Section VII. Conclusion

The NEP Implementation Review process is useful for identifying environmental results, watershed management BMPs, NEP support of CWA core programs, and lessons learned. It is also an effective management tool. The IR process ensures that federal funding is being spent wisely and productively. Further, the on-site visits, in particular, support partnership building and opportunities for EPA to understand on-the-ground environmental protection challenges that face our entire nation.

The new Program Evaluation Guidance reflects the growing capacity and sophistication of the NEPs and watershed protection in general. It will help EPA to do a better job of supporting and monitoring progress toward NEP environmental protection goals, and organizational and local capacity building issues.

The watershed protection model is a strong and viable environmental protection approach thanks in large part to the lessons learned from the National Estuary Program.

For more information contact:

US EPA
Coastal Management Branch
Oceans and Coastal Protection Division
Office of Wetlands, Oceans, and Watersheds
Mail Code 4504-T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Phone: 202-566-1260
Fax: 202-566-1336

www.epa.gov/owow/estuaries