

**OFFICE OF WETLANDS, OCEANS AND WATERSHEDS**

WASHINGTON, D.C. 20460

September 25, 2025

Ms. Caitlin Sweeney, Director
San Francisco Estuary Partnership
375 Beale Street, Suite 700
San Francisco, California 94105

Dear Ms. Sweeney,

Thank you to the San Francisco Estuary Partnership staff and your many partners for contributing to a successful 2025 Program Evaluation 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 enabling the team to meet your staff and visit projects and people in your study area. Below, you will find the results of the Environmental Protection Agency's 2025 PE for the review period from July 1, 2019, to September 30, 2024.

The PE team has concluded that SFEP continues to make significant progress in implementing its Comprehensive Conservation and Management Plan and has rated the SFEP as *proficient* in the 2025 PE. The SFEP will continue to receive support from the EPA.

I would like to note that your evaluation benefited from the voluntary participation of Mr. Robert Pirani, Director of the New York-New Jersey Harbor and Estuary Program who served in an ex-officio capacity on the PE team. Mr. Pirani's participation provided the PE team members with an invaluable individual National Estuary Program perspective. Mr. Pirani also shared information about the New York-New Jersey Harbor and Estuary Program that may be useful for your program and took several lessons learned back to his organization.

The primary purpose of the EPA overall PE process is to help the EPA determine whether each of the 28 programs included in the National Estuary Program, authorized under Section 320 of the Clean Water Act, is making adequate progress in implementing their CCMP. Additionally, the PE process helps the EPA document progress made in the areas highlighted in the previous review, recognize strengths from the individual NEP and identify areas for improvement to assist the individual NEP in becoming a stronger program and achieving environmental results. The evaluation process has considerably enhanced the EPA headquarters and regional knowledge of each individual NEP and promoted the sharing of innovative projects and approaches across all 28 local NEPs. In addition, the EPA uses the evaluation process to assess how the local NEPs support the Clean Water Act programs and to demonstrate the extent of the local NEPs' contributions to the EPA's Powering the Great

American Comeback Initiative, Pillar 1: Clean Air, Land and Water for Every American and Pillar 3: Permitting Reform, Cooperative Federalism and Cross-Agency Partnership.

The PE process uses a two-category determination of *proficient* or *progressing*. *Proficient* means an individual NEP adequately meets programmatic and environmental results. A *progressing* determination means the individual NEP is missing elements or underperforming according to the updated 2025 Program Evaluation Guidance criteria. A *progressing* determination will prompt 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 (a narrative submission from the individual NEP, NEPORT data, annual work plans, and the EPA-required annual end-of-year reports), on-site visits, and through discussions with the individual NEP.

2025 Program Evaluation Findings

The following summary highlights the PE team's key findings by identifying the SFEP's: (I) progress made in the areas highlighted in the 2020 PE, (II) strengths and (III) opportunities for improvement. This summary is intended to recognize the program's successes and recommend efforts to further strengthen the program. The SFEP's response to these recommendations will be evaluated in the next PE scheduled for 2030.

I. Progress Made in the Areas Highlighted in the 2020 Program Evaluation Review

The 2020 PE identified that SFEP needed to conduct a separate vulnerability assessment of CCMP actions. SFEP successfully completed and published this assessment in 2022.¹ It is noteworthy that SFEP integrated the vulnerability assessment of the CCMP actions into the CCMP. This approach has served as a model for other local NEP CCMP updates.

The 2020 PE also suggested that SFEP clarify governance and operational processes with the Association of Bay Area Governments and the Metropolitan Transportation Commission due to the consolidation of ABAG and MTC in 2017. SFEP has made progress in integrating with ABAG/MTC as demonstrated by 1) the incorporation of environment and sustainability into the ABAG/MTC mission in their first strategic plan; 2) ABAG/MTC staff engaging in the update to the CCMP resulting in ABAG/MTC leading several tasks within the CCMP; 3) and SFEP's involvement in the update to the Regional Transportation Plan. SFEP recognizes that a Memorandum of Understanding with ABAG/MTC would help to clarify governance and roles as a program within the MTC structure that could provide stability for the long term. A MOU was not pursued during this PE cycle because ABAG/MTC was undergoing an internal reorganization and was focused on strategic planning.

¹San Francisco Estuary Blueprint Climate Vulnerability Assessment. <https://www.sfestuary.org/wp-content/uploads/2022/04/San-Francisco-Estuary-Blueprint-2022-Climate-Vulnerability-Assessment.pdf>

II. Strengths

Healthy Ecosystems and Clean Waters

Innovative Approaches

SFEP has provided the necessary leadership in the region to advance innovative approaches to meet their Clean Water Act goals. Notably, SFEP has been the champion for horizontal treatment levees which are a relatively new and innovative approach to enhance wastewater treatment while also utilizing nature-based solutions to support habitat and flood management. This approach provides an added layer of nutrient reduction and can provide valuable habitat in a developed or space-limited shoreline. SFEP has led by finding funding and advancing the region's designs for these projects. SFEP has supported different stages of at least four horizontal levee projects this PE cycle: First Mile, Palo Alto, Oro Loma, and the Hayward horizontal levees. SFEP has also been providing workgroup support with permitting agencies of these projects to ensure that the complex permitting hurdles are resolved.

NEP Administration and Governance Structure

Regional Leadership

SFEP has proven itself as a leader in the regional conservation landscape. For example, they are the lead entity for the Integrated Regional Water Management Program, a state bond funded grant program that implements water management solutions on a regional scale. During this PE cycle, SFEP processed \$32 million in IRWM grant funding to support water quality and reliability projects, showcasing SFEP's expertise in administering complex funding programs.

SFEP also leads in adaptation planning by providing regional capacity building and technical assistance to advance nature-based shoreline adaptation projects through the Transforming Urban Waters Initiative and by supporting the Regional Shoreline Adaptation Plan and other related efforts at the regional, sub-regional, and local scales. Integration of SFEP within MTC has provided unique opportunities for SFEP to be a leader in increasing resilience to recurring extreme weather in the region. Much of the San Francisco Bay shoreline is ringed by transportation infrastructure. SFEP is helping ensure investments in these assets are resilient and a wise use of taxpayer money through their participation in the Regional Advanced Mitigation Planning Program and Resilient SR-37 Program. SFEP has also played a key role in providing administrative support for the San Francisco Bay Restoration Authority which was established as part of the voter approved parcel tax to fund restoration projects. SFEP has helped review and score proposals for projects using the parcel tax funds as well as manage funded projects. SFEP staff serve as the lead for the Citizens Oversight Committee, provide support to the Advisory Committee and the Governing Board, and serve as the Treasurer of the Authority. To date the Restoration Authority has authorized over \$138 million in funding and restored or enhanced almost 3,000 acres.

SFEP also serves as a convener for a diverse group of stakeholders and practitioners. By hosting the State of the Estuary Conference, they help foster collaboration and information sharing that directly contributes to implementation of the CCMP goals.

Grant Obligations and Finance

One strength that carried over from the last PE cycle but is still worth mentioning is SFEP's ability to diversify funding sources and leverage funding. As demonstrated in the paragraphs above, SFEP is sought after in the region for environmental grant program management and administration, which expands the reach of SFEP's impact on estuarine health beyond NEP programming alone. SFEP staff also regularly propose and develop grant-funded projects, leveraging competitive grants from a variety of sources. SFEP's average primary leveraging ratio during this PE cycle was \$38.5 to every \$1 of EPA funds.

III. Opportunities for Improvement

NEP Administration and Governance Structure

Expanding Technical Assistance

Per the CCMP Adaptation Action (Action 3) of SFEP's Estuary Blueprint, SFEP intends to create an ongoing technical assistance program recognizing the need to provide sustained support for underfunded local governments and other partners. There is need for regional approaches to the development of plans and projects to combat flooding and other hazards, in large part because California Senate Bill 272, which was signed in 2015, requires subregional shoreline adaptation plans along the San Francisco Bay. SFEP has developed a low touch to high touch approach to help SFEP strategically scale the TA program, and will continue to adapt the services they can provide to partners as they assess the level of demand.

In response to the requirements set forth by SB 272, SFEP identified that expanding TA is needed to support cities in meeting the plan submittal deadline. SFEP will work closely with EPA and the cities they are trying to serve to make sure the growth of the program meets needs while continuing implementation of the CCMP. SFEP is working with local municipalities requesting assistance to ensure the primary goals of these adaptation plans align with SFEP CCMP goals and actions and SFEP core strengths. SFEP is also working collaboratively with the Bay Conservation and Development Commission, the entity approving the shoreline adaptation plans, to determine how SFEP can best support municipalities in plan development. Lastly, SFEP is working towards identifying and securing consistent funding for staffing the TA program. SFEP used IJA funds to provide seed funding to help build up the TA program, accelerating implementation of the CCMP Adaptation Action 3, but the last year of IJA funds is fiscal year 2026. SFEP plans to build support for the program into other grant and loan applications like for the EPA's state revolving fund NEP set-aside.

To ensure the durability of this work going forward the review team suggests that SFEP work internally and with partners to undertake a strengths, weaknesses, opportunities, and threats analysis or similar assessment to ensure that its low-to-high touch approach is feasible. SFEP should also frame its potentially limited capacity to prospective partners while they continue to identify consistent funding sources that can be used to support an ongoing SFEP TA program. The review team suggests SFEP work with its partners to advance ways and means of ensuring that municipal plans advance multiple benefits reflecting SFEP CCMP goals, actions and core priorities to the extent possible such as

restoration, water quality, and public access goals. This could include addressing how meeting these goals are treated in the evaluation of adaptation plans.

Clarifying Roles with the Host Entity

Since the consolidation of ABAG and MTC in 2017, SFEP has been adjusting to a new governance structure within the larger organization. SFEP recognizes that developing an MOU with ABAG/MTC will be helpful in clarifying SFEP's role in ABAG/MTC's governance structure, especially due to the likelihood of future turnover which can result in a loss of institutional knowledge of the relationship SFEP has developed with ABAG/MTC. The review team understands an MOU was not pursued during this PE cycle due to the focus on an internal reorganization and strategic planning efforts. The review team advises SFEP move forward with engaging ABAG/MTC to develop an MOU, or similar mechanism, and be specific in the objective of the MOU.

Thank you again for participating in the PE process. We welcome any thoughts or suggestions you may have regarding the evaluation process itself or the EPA's involvement in implementing the SFEP's CCMP. If you have any questions or comments, please contact me at 202-564-3169 or via email at barger.cindy@epa.gov, or Sara Schwartz at 202-566-0528, or via email at schwartz.sara@epa.gov.

Sincerely,



Cindy Barger
Branch Chief, Partnership Programs Branch

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