



Department of Health

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Executive Deputy Commissioner

November 2, 2015

David S. Warne
Assistant Commissioner
NYC Department of Environmental Protection
Bureau of Water Supply
465 Columbus Avenue
Valhalla, NY 10595

Dear Mr. Warne:

NYSDOH and USEPA have reviewed the Revised 2007 FAD deliverables that were due September 30, 2015. Our comments are attached. We would appreciate if you could provide a reply to these comments by December 4, 2015.

Please feel free to contact me if you have any questions.

Sincerely,

Pamela L. Young, Ph.D.
Chief, NYC Watershed Section
Bureau of Water Supply Protection

Att.

Cc (electronic):

R. Sokol
T. Boepple-Swider
P. Sweeney – USEPA
K. Kosinski/T. Snow – NYSDEC

DOH/EPA Comments on FAD Deliverables due September 30, 2015

2. SWTR Objective Criteria Compliance

As required by the Revised 2007 FAD, DEP submitted a scope of work for an expert panel review of the City's Watershed Protection Programs.

4.1 Waterfowl Management Program

The annual report on the Waterfowl Management Program was submitted as required by the Revised 2007 FAD.

West Branch Reservoir (page 31) is one of five reservoirs in the New York City system in which bird management is performed on an "as needed" basis. Waterbird surveys were conducted during the month of April 2014 and from August 1, 2014 through April 15, 2015 on a biweekly schedule. A high count of waterbirds occurred at West Branch Reservoir on December 5, 2014 when 3,132 birds were observed. One of the criteria for implementation of avian management measures is "fecal coliform bacteria concentrations approaching or exceeding 20 colony-forming units per 100 milliliters [CFU/100 mL] at reservoir effluent structures coincident with elevated bird populations." Another is "current bird populations, including roosting or staging locations relative to water intakes." Fecal coliform levels remained less than 20 CFU/100 mL at site CWB1.5 at the time of the high count, and bird dispersal was not initiated. It would be helpful to the reader to clarify that fecal coliform levels are the primary trigger that would lead to further assessment of the need for bird management measures.

Large numbers of roosting birds might add nitrogen and phosphorus to the water column, which could contribute to algal blooms the following summer. Has NYCDEP explored, or does NYCDEP have data that show, the potential for nutrient contributions from roosting birds? NYCDEP's monthly operation reports indicate that West Branch Reservoir has been operating on bypass mode for much of the period covered by the Waterfowl Management Program report. When operating under bypass mode, does sample site CWB1.5 adequately represent the water that would enter the water system if operations were changed to reservoir mode?

On page 49, the report states, "*E. coli* (grab samples) levels remained relatively unchanged entering Hillview at water quality sampling locations Site 2 when compared with samples leaving the reservoir at sampling Site 58." This statement, combined with Figures 27 and 29, suggest that a link is being explored between nocturnal counts of total waterbirds in Zone 2 of Hillview Reservoir and positive *E. coli* grab samples at Site 58 (Downtake 2). This relationship is unclear, as water in the Delaware Aqueduct travels directly from Site 2 to Site 58, and does not enter the Hillview east basin. Is the attempt to find an influence of Zone 2 waterbirds on Site 58 via the South Connecting Conduit?

4.2 Land Acquisition

The Revised 2007 FAD requires DEP to annually consult with NYSDOH/USEPA and NYSDEC regarding the potential need for any additional monies beyond that already committed to land acquisition. The regulators agree that the program has adequate funding at this time.

4.11 Catskill Turbidity Control Program

The Revised 2007 FAD requires DEP to convene a progress meeting by September 30 of each year. NYSDOH agrees that, due to a scheduling conflict, it was necessary to schedule this year's meeting on October 20, 2015.

5.1 Watershed Monitoring Program

The Revised 2007 FAD requires DEP to annually participate in education seminars on watershed monitoring. On September 9, 2015, the NYC Watershed Science and Technical Conference was held. DEP was a conference sponsor, and DEP staff attended and presented at the conference.

7. Catskill/Delaware Filtration and UV Disinfection Facilities

The Revised 2007 FAD requires DEP to biennially update the preliminary design for the Catskill/Delaware Filtration Facilities, beginning September 30, 2015. Upon review, DEP has concluded that no design revisions are necessary at this time. NYSDOH/USEPA agree with this conclusion.

9. Administration

The annual report on FAD budget and staffing was submitted as required by the Revised 2007 FAD. The deliverable has been met.

NYSDOH notes that several programs have been moved, such as Early Warning Remote Monitoring, and Distribution Science and Planning. Please explain the realignments that have occurred, and how these changes support the FAD programs.

There are significant decreases in the FY15 budgeted positions for Early Warning Remote Monitoring (loss of 8 positions from FY14), Instrumentation and SCADA (loss of 2 positions), and Operations – Eastern Cat Del UV (loss of 16 positions). Please explain these changes (it is acknowledged that this may be related to the previous comment).

The positions in the pipeline for the Upstate Police Force should total 27, not 37.

Thirteen positions are budgeted for Hydroelectric, under Operations – Western. This item was not in the previous FY14 budget. Are the positions associated with work at the Cannonsville Reservoir?

The total positions provided in Table 1 for the Bureau of Water Supply are incorrect. The table states 866 budgeted positions, 819 filled positions, and 47 in the pipeline, and shows the percentage of filled positions as 94.6%. However, adding the subtotals in the table produces 1120 budgeted, 1045 filled, and 75 in the pipeline, with a filled percentage of 93.3%.