

NEW YORK
state department of
HEALTH

Howard A. Zucker, M.D., J.D.
Acting Commissioner of Health

Sue Kelly
Executive Deputy Commissioner

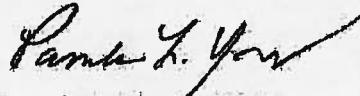
November 3, 2014

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 through September 30, 2014. Our comments are attached. We would appreciate if you could provide a reply to these comments by December 5, 2014. 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: R. Sokol
T. Boepple-Swider
P. Sweeney - USEPA
K. Kosinski - NYSDEC

DOH/EPA Comments on FAD Deliverables due September 30, 2014

4.1 Waterfowl Management Program

The annual report on the activities of the Waterfowl Management Program was submitted as required by the revised 2007 FAD. The deliverable has been met.

The report clearly documents the continued success of this program in managing the numbers and potential impacts of waterfowl and other wildlife on targeted NYC reservoirs. We offer the following questions/comments on this report:

- On page 22, second paragraph, the report states that "...the high count of gulls reached 268 on October 13, 2014." Was this observation actually made on October 13, 2013?
- The report provides daytime counts of birds at West Branch, Rondout, and Ashokan Reservoirs. These observations were recorded to provide supplemental information in response to NYSDOH's approval of NYCDEP's request to reduce weekly bird surveys for these reservoirs to "as-needed". Given that bacterial contributions from waterfowl occur mainly from waterfowl roosting on the reservoirs at night, does NYCDEP feel that these daytime observations offer information that enhances water quality protection?
- The last paragraph on page 30 notes that, "The reduction in bird surveys in 2013/2014 from the previous year may not capture temporary or short-term migratory population increases." Now that bird survey frequencies have been reduced at West Branch, Rondout, and Ashokan Reservoirs for over one year, please provide a brief discussion evaluating the potential impacts of this change and whether or not maintaining current frequencies is sufficient to meet program goals, including identifying annual trends in bird numbers and identifying possible sources of elevated fecal coliform.
- With the revision of the 2007 FAD, the due date for this report was changed from July 31 to September 30 of each year. Given this change, would it be feasible to change the reporting period for the report, which currently ends on March 31 of each year, to a period that ends closer to the report due date (e.g., through July 31)? This would provide a more timely report on the status of the program.

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 only two of nine positions have been filled, with no positions in the pipeline, in Fiscal Year 2014 in Wet Chemistry in NYCDEP's Distribution Water Quality Laboratory Operations – Management Program. Please provide a brief explanation for the discrepancy and any impacts the shortfall may have on NYCDEP's analytical capabilities.