



## Department of Health

**ANDREW M. CUOMO**  
Governor

**HOWARD A. ZUCKER, M.D., J.D.**  
Commissioner

**SALLY DRESLIN, M.S., R.N.**  
Executive Deputy Commissioner

May 27, 2015

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

Dear Mr. Warne:

Section 4.4 of the Revised 2007 Filtration Avoidance Determination (FAD) requires that the New York City Department of Environmental Protection (DEP) develop 50 new Whole Farm Plans (WFPs) on large, small, or east-of-Hudson farms unless written evaluation and justification for developing fewer than 50 new WFPs is submitted to NYSDOH/EPA for review and approval.

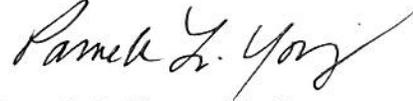
In its January 31, 2015 FAD submittal entitled "Evaluation of the Watershed Agricultural Program's BMP Prioritization Methodology, Summary of BMP Implementation Status, Review of Current Metrics, and Justification for Developing Fewer than 50 New Whole Farm Plans", DEP provided a written evaluation of, and justification for, developing fewer than 50 new WFPs during the Revised 2007 FAD period. Since January 2012, 34 new WFPs have been developed, and DEP has committed to complete an additional six new WFPs that are in process.

NYSDOH/EPA have reviewed DEP's submittal. The contents of the report and justification for relief from the 50 new WFPs requirement were further discussed at a meeting with NYSDOH/EPA, NYSDEC, and DEP on April 27, 2015. Based on the information provided, NYSDOH/EPA approve DEP's request to develop fewer than 50 new WFPs.

DEP has indicated that it will work with the Watershed Agricultural Council to develop criteria for evaluating farms for future WFP development. As the Watershed Agricultural Program evolves and planning for the next FAD begins, NYSDOH/EPA will review these criteria and continue to assess the metrics for the program.

Please feel free to contact me should you have any questions or would like to discuss these matters further.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela L. Young". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

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

Cc (electronic);

R. Sokol  
T. Boepple  
I. Birman/P. Kaczmarczyk  
P. Sweeney – USEPA  
T. Snow – NYSDEC  
S. McCormack – NYCDEP