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Acting Commissioner

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

March 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 by January 31, 2015. Our comments are attached. We would appreciate if you could provide a reply to these comments by March 31, 2015. Please feel free to contact me if you have any questions.

Sincerely,

Pamela L. Young

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 – NYSDEC

NYSDOH/USEPA Comments on
FAD Deliverables due January 31, 2015

4.4 Watershed Agricultural Program

The Revised 2007 FAD required NYCDEP to submit a report that evaluates the Best Management Practices (BMP) Prioritization Methodology, summarizes the implementation status of the Watershed Agricultural Program (WAP), and assesses the adequacy of current metrics for the program. In addition, the FAD required that NYCDEP develop 50 new Whole Farm Plans (WFPs), unless they submit justification for developing fewer than 50 WFPs. Justification must be submitted by 8 months after issuance of the Revised FAD, which was issued in May 2014. Justification to modify the requirement to develop 50 WFPs was included in the program assessment report. NYSDOH/USEPA acknowledge that both these deliverables have been met. NYCDEP's report presented a very concise and informative summary of the status of the WAP. The report concluded that several of the program metrics are adequate and should remain unchanged. The report also provided specific recommendations for modifying some metrics. In accordance with the Revised 2007 FAD, by April 30, 2015, NYSDOH/USEPA and NYSDEC will meet with NYCDEP to discuss the status of the WAP and review the adequacy of current metrics. We will discuss NYCDEP's recommendations further at that time.

4.6 Stream Management Program and 4.7 Riparian Buffer Protection Program

The Revised 2007 FAD required DEP to convene a meeting of the Riparian Buffer Working Group and to meet with the Stream Management Program county contracting partners to discuss Annual Action Plans. NYSDOH/USEPA acknowledge that both these deliverables have been met.