



Department of Health

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Executive Deputy Commissioner

June 23, 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 May 31, 2015. Our comments are attached. We would appreciate if you could provide a reply to these comments by July 31, 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 – NYSDEC

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

4.6 Stream Management Program

The Revised 2007 FAD requires that, each year, a rolling two-year Action Plan be submitted for each of the West of Hudson basins. The 2015 – 2017 plans outline the upcoming projects in the program areas (Stream Projects, CSBI, SMIP, Education/Outreach/Training, and LFHMP). NYSDOH/USEPA have the following comments:

Ashokan 2015 – 2017 Action Plan

- In the Background section (page 4), the fourth paragraph should read “Filtration Avoidance *Determination*” not Declaration.
- Please clarify whether the funding amount of \$209,750 shown in the table for USGS proposal AWSMP-2011-27 (page 6) is for the entire study, or just for the Action Plan period.
- Please provide more information on the Chichester Reach Hillslope Bioengineering and Channel Structure Modification (page 7).
- Regarding the documentary film on the Ashokan Watershed fishery and its history (page 9), please provide more information on how this project encourages stream stewardship and promotes the goals of the Ashokan Watershed Stream Management Program.
- The grants to the Town of Olive (AWSMP-2013-69) and the Town of Shandaken Highway Department (AWSMP-2013-78) have the same listed purpose (page 13). Based on DEP’s response to this comment last year, the purpose of the Town of Olive grant should read: “Engineering to determine appropriate sizing and design of a culvert replacement for the Hillside Drive crossing.”
- In Section E, Item 9 refers a report by the New York Natural Heritage Program (page 15). Please provide a reference or link to the report.
- The 2014-2016 action plan in Item 6 (page 17) referred to organizing a “Stream Integrity Research & Assessment science forum” with 1-2 meetings per year, or as needed. This activity is not included in the 2015-2017 action plan. Has it been dropped as an activity, or was it folded into the Stream Ecosystem Working Group?
- The 2014-2016 action plan noted a pending project (AWSMP-2013-74) titled “Assessing the Impact of Groundwater and Heterogeneous Glacial Deposits on Streambank Erosion in the Stony Clove Creek Watershed” (page 18). However, it does not appear to be included in the 2015-2017 action plan. What was the outcome of that proposal?

Delaware 2015 – 2017 Action Plan (East and West Branch Delaware River)

- The table on page 5 would benefit from the inclusion of the funding awarded for the listed SMIP grants.
- Item 4.B.3 (page 11) discusses utilization of the gravel management protocol. NYSDOH/USEPA would be interested in receiving the most recent version of this protocol.
- Under Item 4.D (page 12), three demonstration construction projects are listed for 2015 and 2016. Please provide a brief description for each project.
- Item 6.K.8 (page 18) states that the DCSWCD website will be maintained with updated project statuses and education outreach information. Currently, it appears that only projects from 2007 and 2008 are described on the website.

Rondout/Neversink 2015 – 2017 Action Plan

- NYSDOH appreciates the inclusion of the planning calendar, as well as the “Year 1” and “Year 2” breakout for each category of the current contract scope of work. However, the references to the Stream Management Plan (SMP) “General Recommendations” are slightly confusing. Since this action plan covers SMPs for the Rondout Creek, Chestnut Creek, East Branch Neversink River, West Branch Neversink River, and Main Branch Neversink River, it is not clear which section numbers relate to which SMPs.
- Please revise the fourth paragraph on page 2 to include the numbers of: projects completed; area in acres; miles of linear buffer; and trees and shrubs installed.
- Last year’s action plan anticipated that the Claryville LFHMA would be completed and the Sundown flood analysis would be initiated in the “Year 2: 2015-2016” period. The current plan (page 3) appears to push these items back again into Year 2, now 2016-2017. In addition, a research subcommittee was expected to be initiated, but that also appears to be delayed. Please clarify the anticipated time frame for these activities.
- NYSDOH/USEPA note the growth of the outreach and education components in this action plan (page 6), including the Hemlock Woolly Adelgid Summit and the Anglers Symposium, as well as Rosgen training.

Schoharie 2015 – 2017 Action Plan

- Under Section VI (page 15), the second sentence reads: “The GCSWCD already has a number of these projects underway, and between 2011 and 2013 will continue to move forward with these projects.” Should these years be 2015 and 2017?
- Consider changing the formatting and content of this plan to make it similar to the action plans for other basins. While the wealth of information provided in the plan is appreciated, it would be beneficial to include a summary table of projects similar to Appendix A of the Ashokan plan.

- With a few exceptions, the majority of activities/projects will be conducted or installed in 2015. NYSDOH/USEPA request that the next action plan submitted also include anticipated activities for the latter portion of the two-year planning period.
- Please include a definition for the “SMP Recommendation” category and the numbering system used. This will make it clear that, as discussed in the first paragraph on page 2, the activities in the Action Plan are being referenced directly to specific recommendations found in stream management plans.

5.1 Watershed Monitoring Program

The Revised 2007 FAD requires DEP to coordinate a technical Pathogen Working Group Meeting by May 31 of each year. This meeting was held on May 29, 2015.