



Catskill Watershed Corporation

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EMAIL COVER SHEET

To: POLICY COMMITTEE

ATTN: Christopher Mathews Alicia Terry
Tina Molé Thomas Snow
Richard Parete Shilo Williams
Innes Kasanof John Kosier

CC: CWC Staff, John Schwartz, Michael Meyer, Matthew Giannetta,
Thomas Stalter, Gerson Tavaréz and Aaron Bennett

SUBJECT: POLICY COMMITTEE MEETING NOTICE

DATE: Tuesday, August 4, 2026

TIME: START: Immediately Following Septic Committee

LOCATION: Catskill Watershed Corporation Building

Additional Instructions:

Please be advised that the Policy Committee meeting has been scheduled. Below please find the agenda and minutes from the previous meeting. If you have any questions or concerns, please contact Timothy Cox.

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CWC POLICY COMMITTEE

August 4, 2026

AGENDA

CWC POLICY COMMITTEE

AUGUST 4, 2026

AGENDA

- I. Call to Order
- II. Election of Chair
- III. Approval of July 7, 2026 Minutes
- IV. CWC Contract Evaluations of NYC DEP
(See attached)
- V. Other
- VI. Schedule Next Meeting
- VII. Adjourn

CWC POLICY COMMITTEE

JULY 7, 2026

DRAFT MINUTES

Members Present: Shilo Williams, Richard Parete, Tina Molé, Alicia Terry, Innes Kasanof, Christopher Mathews, John Kosier.

Excused: Thomas Snow

- I. Called to Order at 11:17 am
- II. June 2, 2026, Minutes unanimously approved upon motion of Alicia Terry, seconded by Richard Parete.
- III. CWC Board Election Update
Tim Cox stated that there are three CWC Board seats open in Delaware County thirteen ballots had been received Ballots were opened earlier on July 7, 2026, by CWC Board Secretary Alicia Terry and Tim Cox. Results will be announced at the CWC Annual Meeting on July 14th.

IV. Operational Excellence Department Overview and recent activities

Jason Merwin introduced Jessica Fiedler, Grants and Operational Excellence Manager of CWC, to the CWC Board. Jason explained that the Grants and Operational Excellence Department exists to assist other CWC departments in the implementation of their programs.

Jessica Fiedler presented a slideshow to the CWC Board illustrating various initiatives and processes within Operational Excellence, including the ticketing system for information and technology requests, file organization and accessibility, and process streamlining, among other things. Jessica emphasized that as CWC grows and brings various operational processes up to date, it is important that cross-departmental communication is as seamless as possible.

Jessica introduced Zach Baldwin-Way, Operational Excellence Program Specialist, who presented to the CWC Board the process by which CWC staff submit requests to the Operational Excellence Department. Zach went into detail on the ticketing process for staff requests.

Alicia Terry requested a copy of the Powerpoint and remarked that the department is doing important and meaningful work.

- V. Next Meeting scheduled for August 4, 2026
- VI. Adjourned at 12:15 pm

July xx, 2026

Dear Watershed Stakeholders:

The Catskill Watershed Corporation (CWC) respectfully submits its Fiscal Year 2026 (FY26) Contract Management Evaluation Report regarding implementation and administration of various New York City Department of Environmental Protection (NYCDEP) contracts and Watershed Protection and Partnership Programs.

For nearly three decades, the Watershed Protection and Partnership Programs have served as an internationally recognized model demonstrating how environmental protection and community interests can be advanced through collaboration. CWC remains committed to that model and continues to believe the most effective solutions are achieved through open communication, mutual respect, transparency, and a shared commitment to protecting the water supply while supporting the vitality of watershed communities.

CWC recognizes several important accomplishments in FY26, including continued advancement of major wastewater and environmental infrastructure projects, ongoing septic remediation efforts, community vitality initiatives, and the administration of numerous programs providing direct benefits to watershed communities and water quality protection. CWC also wants to recognize the many NYCDEP staff members who continue to work constructively with CWC on a daily basis and whose professionalism and responsiveness contribute positively to these programs.

Unfortunately, FY26 also revealed a number of recurring and increasingly concerning challenges. Unlike recent years, where CWC observed gradual improvements in communication, project coordination, and contract administration, the FY26 reporting period reflected a noticeable step backward in several critical areas. Throughout multiple programs and contracts, CWC experienced delays in contract administration, funding availability, contract amendments, implementation of negotiated commitments, and project approvals. These issues were not isolated incidents but rather recurring themes appearing across numerous evaluations contained within this report.

Perhaps most concerning is that many of these challenges were predictable. In several instances, CWC identified potential funding shortages, procedural inefficiencies, contracting concerns, and implementation risks well before they became actual obstacles. These issues were discussed privately with NYCDEP staff, raised during contract negotiations, documented in written correspondence, and in some cases highlighted in prior annual evaluations. Despite those warnings, several of the exact concerns ultimately materialized during FY26. The resulting delays were not merely administrative inconveniences; they affected project schedules, limited funding availability, delayed environmental improvements, and required significant expenditures of staff time and organizational resources from CWC and DEP to overcome.

The evaluations also reveal a broader concern regarding the pace at which commitments are translated into action. Watershed stakeholders negotiated and supported significant initiatives

intended to advance wastewater infrastructure, stormwater management, septage handling, economic development, and community vitality. However, in too many cases the time required to move from agreement to implementation far exceeded reasonable expectations. Delays in developing, negotiating, registering, and funding contracts have increasingly become barriers to achieving the very environmental and community benefits those agreements were intended to produce. As construction costs continue to escalate and inflation places additional pressure on project budgets, delayed implementation carries tangible financial consequences for both New York City and watershed communities alike.

CWC also remains concerned that administrative complexity continues to grow where simplification appears possible. Several evaluations document situations where programs functioned efficiently when clear funding structures, adequate reserves, and straightforward approval processes existed, while others experienced repeated difficulties associated with funding thresholds, contractor approvals, contract amendments, or administrative review procedures. In some cases, solutions ultimately agreed upon by all parties proved substantially more efficient than the processes they replaced, raising legitimate questions about why those improvements required months of negotiation to achieve.

Likewise, CWC's review of regulatory approval timelines continues to identify trends that warrant attention. While water quality protection must remain the overriding objective of every watershed program, lengthy and increasing approval periods create real challenges for homeowners, municipalities, engineers, and program administrators. The FY26 data indicates that several of these trends continue to persist and, in certain areas, have worsened beyond levels previously identified as areas of concern.

CWC remains fully committed to working collaboratively with NYCDEP to identify solutions, improve program delivery, and strengthen the Watershed Partnership. In fact, many of the issues discussed throughout this report have already been the subject of extensive conversations between our organizations over several years. In numerous instances, CWC identified potential funding shortages, administrative inefficiencies, contract limitations, implementation barriers, or regulatory concerns well before they became actual obstacles. Many of these concerns were ultimately acknowledged by NYCDEP, and in several cases solutions were eventually developed and agreed upon. That reality is both encouraging and frustrating. Encouraging because it demonstrates that solutions often exist; frustrating because many of those solutions could have been implemented earlier, reducing delays, uncertainty, administrative burden, and costs to all parties involved.

While CWC appreciates NYCDEP's willingness to engage in discussions regarding these issues, FY26 has caused us to reflect on the level of institutional commitment being demonstrated toward resolving known problems. Commitment is measured not only through discussion, meetings, and expressions of support, but through action. A recurring theme throughout this evaluation is that many challenges identified are not the result of insurmountable legal, regulatory, or financial obstacles. Rather, the record demonstrates that when NYCDEP determines a matter is a priority, funding approaches can be modified, contract amendments can be expedited, alternative processes

can be developed, requirements can be interpreted more flexibly, and practical solutions can be found. The concern raised by this evaluation is therefore not whether solutions are available, but whether sufficient urgency and commitment are being applied to pursuing them in a timely, consistent, and predictable manner.

Looking forward, CWC believes the most successful path for both organizations is a renewed emphasis on efficiency, implementation, and problem-solving as default objectives. Too often, watershed stakeholders encounter initial responses focused on limitations, restrictions, funding constraints, procedural barriers, or reasons projects cannot move forward, only to later arrive at a workable solution after extensive effort and delay. CWC believes the partnership works best when all parties begin from a position of trying to help, trying to find a path forward, and trying to achieve the shared goals of water quality protection and community vitality. Consistent application of requirements, predictable funding structures, timely implementation of negotiated commitments, and a proactive commitment to solving problems rather than managing them would serve both watershed communities and New York City well.

Despite the concerns documented in this report, CWC firmly believes the path forward remains collaboration—not confrontation. The issues identified should not be viewed solely as criticisms, but as opportunities to improve systems that both organizations rely upon to achieve shared watershed objectives. Many of the challenges highlighted throughout this evaluation are solvable. CWC remains ready and willing to work alongside NYCDEP to develop practical solutions, improve program performance, and strengthen the partnership that has delivered meaningful environmental and community benefits for nearly thirty years. However, meaningful progress will require a demonstrated commitment from both organizations. Ultimately, acknowledgment of concerns is important, but action is what evidences commitment.

Respectfully submitted,

Jason Merwin

Executive Director

Catskill Watershed Corporation

Cluster Septic Program

The summary below is a direct copy of what was submitted by CWC in last years evaluation. There have been no changes or assistance from DEP to improve or restructure the program. There have been years of discussion but ultimately CWC is still without a functioning program.

A recommendation from last year's evaluation included restructuring the contract from all capital to capital and expense. CWC, DEP, and NYSDOH held a meeting on the Cluster Program in early 2026 where DEP acknowledged the ability to do so but have made no attempts or efforts to address these shortcomings.

CWC does note however, that New York State Department of Environmental Conservation (DEC) and ultimately NYS taxpayers have provided more for the CWC Septic Cluster Program, a NYC FAD mandated program, than the City. In early 2026, CWC in collaboration with the Town of Middletown were successful in applying for a DEC Smart Growth Grant to complete feasibility studies on two of the identified communities in the CWC Cluster Program, which are also defined in the CWC/DEP contracts. Where DEP has refused to come to the table to assist in their own obligations, the State has come to the Watershed communities assistance. CWC appreciates DEC and the State's funding and assistance but continue to be extremely frustrated and disappointed at DEP's not only reluctance, but straight refusal to meet their obligations.

2025 Evaluation:

The Septic Cluster Program was envisioned as a collaborative effort to address wastewater management challenges in rural communities, striving to balance community vitality with water quality protection. However, the program has faced substantial obstacles in implementation. There is a clear disagreement and disconnect centered around contract structure and CWC's and NYCDEP's visions for the program's future.

Since 2023, a number of meetings and exchanges of letters between CWC and NYCDEP has revealed key programmatic challenges. CWC has repeatedly identified procedural and contract-related obstacles to implementing the Cluster Program, particularly NYCDEP's stipulation that the program is funded solely with capital funds, which limits eligible activities and expenditures. In a letter dated July 6, 2023, NYCDEP stated that for projects to receive awards, applicants must agree to construct and maintain the entire project before any evaluation or design work occurs—essentially requiring municipalities to commit to a project before exploring their options or conducting feasibility studies. CWC argued that this requirement is contrary to the original spirit of the program, as it places undue risk on municipalities and discourages participation. Copies of each correspondence are included as Attachment [A].

Despite CWC's presentation of several potential improvements aimed at making the program more flexible and appealing, NYCDEP has declined to accept any changes, expressing a preference to discontinue the program. This resistance to adaptation has dampened municipal interest and, in CWC's view, undermined the credibility of the program.

CWC continues to believe in the fundamental merits of the Cluster Program, rooted in sound environmental and community principles. CWC disagrees with the notion that the program should be ended without further evaluation. CWC instead has called for renewed collaboration and a reassessment of the program as a whole, including eligible community areas as well as contract structure to allow the program to achieve its intended purpose.

To move forward, CWC recommends several steps. First, amend the funding of the Septic III contract to change it from a capitally funded contract to an expense funded contract. This change that can only be completed by NYCDEP, would allow for the second step. The program structure should be updated to allow potential projects to be evaluated and implemented in phases similar to CWC's successful CWMP program, FHMIP program, and Stormwater Retrofit program. Each of these programs provide a successful model of phasing projects by feasibility study, design, construction, and maintenance. By performing phased projects, municipalities would be able to best evaluate options going forward.

The final step would be for CWC and NYCDEP to collaborate on identifying existing problem and priority areas for the program. Existing cluster areas were developed many years ago and are not structured in an efficient manner for program implementation. CWC believes a collective effort by our organizations could find a number of priority areas that could result in excellent projects, providing wins for the municipalities and the water supply.

In summary, while contractual and procedural barriers have hindered progress, the CWC Septic Cluster Program remains a promising model for rural wastewater management and environmental stewardship in the Watershed. CWC hopes NYCDEP will reconsider its position, return to the table, and work together to maximize the program's potential for communities and water quality alike.

MOA-145

Last year's contract evaluations noted a recent amendment to the MOA-145 contract and CWC's concerns about the limitation of on-hand funding levels allowed for the program. Despite CWC's voiced concerns both privately and publicly, we have unfortunately and unsurprisingly been required to table an eligible stormwater application for nearly a year, see July 7, 2026 Agenda excerpt below:

VIII. Res #5834 Tab 6 – MOA 145 – Stonewall Windham LLC – Tabled 9/2/25, 10/7/25, 11/4/25, 12/2/25, 1/6/26, 2/3/26, 3/3/26, 4/7/26, 5/5/26 & 6/2/26

This inefficiency and inability for CWC to approve this project was predictable. Worse, even after occurring, DEP continued to withhold initiation of a contract amendment for several months.

In April 17, 2026, after 8 months of inaction, DEP finally acknowledged the ongoing concerns and agreed to begin another amendment process to increase the on-hand funding threshold to \$1 million, an amount CWC had previously requested more than a year prior but was rejected. CWC received a draft of this amendment on April 29th, and final language was mutually agreed upon by May 4th. Notification that the contract amendment had been registered was received by CWC on July 6, 2026. Subsequently, CWC asked DEP about invoicing for the additional funding required to move forward with approving the postponed application. DEP responded that funding had not yet been encumbered, and that invoicing would need to be deferred until funds became available, resulting in further delays to project approval.

All of this has prevented the MOA 145 Program from performing its purpose as provided under the 1997 Watershed Agreement, to reimburse for DEP Watershed Regulation stormwater requirements. Larger, more expensive stormwater applications are anticipated and the program will continue to experience this inability to reimburse property owners. CWC has repeatedly communicated its understanding of the concerns regarding the substantial on-hand funding. Nonetheless, the ongoing contract amendment processes have resulted in inefficiencies, significant frustration, and delays, which are unsustainable and contribute to increased costs for City rate payers. These challenges also undermine the objectives established in the MOA and FAD.

Furthermore, CWC has communicated to DEP our concerns surrounding interactions between DEP as a regulator and the applicant, particularly in relation to insufficient advancement in stormwater management at the property. The correspondence included as Attachment B, dated December 23, 2025, evidences that DEP advised the property owner to proceed with their project. This notification was issued more than four months into the tabled application process for funding. While DEP's regulatory responsibilities are acknowledged by CWC, it is also noted that DEP holds a funding responsibility which has not been adequately fulfilled. From CWC's perspective, it is problematic for an applicant who has complied with all regulatory requirements, including completing a SWPPP and applying to CWC for funding, to be delayed due to DEP's unilateral decision not to amend CWC's contract. Subsequently, DEP adopts a strict stance with the same property owner to complete the necessary work. CWC further notes that delays in approving over half a million dollars for the stormwater project may understandably be a concern for the applicant, given the substantial value and the proportion of the overall stormwater budget involved.

Shokan Wastewater Management Project

Background

The Shokan Wastewater Management Project is the largest and most significant water quality infrastructure project undertaken within the Catskill Watershed since adoption of the 1997 Memorandum of Agreement. The project was developed to address longstanding wastewater concerns while advancing watershed protection objectives required under the Filtration Avoidance Determination. Approximately 525 properties are in the sewer district, and in a 2022 referendum vote, over 84% of the property owners voted to form the district and move forward with this project. Throughout the project, CWC worked closely with the Town of Olive, engineering consultants, regulatory agencies, and NYCDEP to advance planning, design, funding, permitting, and construction activities.

Bid Results and Initial Funding Concerns

After construction bids were received in late October and early November 2025, it became clear that previous funding approvals would not cover the full project costs. On November 3, 2025, CWC informed DEP that bids were roughly 27% higher than initial estimates, with projected costs nearing \$89 million. CWC indicated plans to draft a resolution to voluntarily contribute \$10,000,000 from the Catskill Fund for the Future (CFF), so the project could proceed without delay, until a change order was in place. This move would enable the Town to accept bids immediately, rather than wait for a CWC/DEP contract modification and rebid the project later, which could postpone implementation of this crucial water quality initiative and drive costs up. The resolution conditioned the CFF funding on “NYCDEP agreeing in writing prior to December 8, 2025 to a block grant no greater than Ninety Million Dollars (\$90,000,000.00) based upon bids received, contingencies, and engineering costs, as well as commit to amend the Shokan Project Agreement to reflect the amended block grant and to reimburse CWC for amounts spent from the Catskill Fund for the Future for the Shokan Project.” The CWC Board approved the resolution at their November 4, 2025 meeting.

DEP Response

On December 2, 2025, CWC received a letter from DEP Commissioner Aggarwala. The letter included as Attachment C, indicated DEP’s commitment to the project and offered to fund an additional \$4.6 million toward the project with the conditions that CWC agree to transfer existing funding from other contracts to the Shokan project, apply current and future interest earnings towards the project, and pursue all reasonable cost-saving opportunities.

CWC immediately responded to DEP on December 2nd where we agreed to each of these conditions outlined by DEP but noted that DEP’s commitment did not include any of the three conditions required by the CWC Board of Directors in order to allocate \$10,000,000 CFF funding and recommend the Town of Olive accept the construction bids.

Two days later, CWC received an amended commitment letter, included as Attachment C-1, agreeing to a \$90 million block grant, an amendment to the Shokan Project Agreement, and to reimburse CWC for any funding utilized by the CFF towards the project.

With that letter, CWC recommended the Town of Olive accept construction bids and start the project.

Contract Amendment: Funding

The next steps were to come to terms on a contract amendment with DEP to increase funding levels and allow for CWC to be reimbursed CFF funds utilized for the project. CWC received a first draft on December 18, 2025. It was anticipated that it would be a relatively simple amendment to make this happen but there were many issues throughout the negotiation process, most notably DEP's desire to reduce the amount of the block grant in the contract. CWC noted that DEP had just approved a \$90 million block grant and we utilized that guaranteed value as part of our recommendation to the Town of Olive to proceed to construction. That DEP block grant amount was in turn relied upon the Town of Olive when it awarded the construction bids. DEP continued to take the position they were unable to agree to a \$90 million commitment in the contract despite their block grant letter. After roughly 5 months of discussions, DEP ultimately agreed to keeping the contract commitment consistent with the previously issued block grant.

CWC also had to insert and reinsert after removed from exchanged drafts, the ability for CWC to be reimbursed for any funds utilized from the CFF. This was a key condition for CWC's proactive and voluntary action to utilize our own funds to help keep the project moving forward. This allocation also reduced available funding for Watershed Counties, causing CWC to limit Ulster County applications to businesses physically located in the Watershed, rather than in Watershed towns. It was disheartening to see DEP missed initially repayment of CFF funds and missed in future drafts after CWC's included it.

CWC and DEP finally agreed on contract terms, with DEP agreeing to provide \$6.1 million in funding for the project on April 30, 2025, nearly 5 months after DEP's initial commitment to the project and bids being awarded by the Town of Olive. As of the time of this evaluation dated, July 12, 2026, CWC has still not received the additional funding for the project.

Administrative Issues and Delays

Beyond funding concerns, the project has experienced substantial administrative challenges associated with contract management and contractor approvals.

During the first seven months of 2026, CWC repeatedly raised concerns regarding approval processes and compliance requirements that were delaying project implementation. Correspondence between CWC and DEP documented ongoing negotiations regarding contractor approval procedures, review periods, PASSPort requirements, and contract amendment language. CWC consistently advocated for expedited review timeframes in order to prevent unnecessary delays in construction and construction oversight activities.

During some of the initial delays and administrative issues surrounding the City's PASSPort system, which is a requirement under the CWC/DEP Program Agreement, CWC reached out to DEP on many occasions for assistance. The Shokan project has many contractors who were required to be put through and approved through the PASSPort process. However, it became clear early in the process that something was off. At one point, the system would not allow the full contract value of a contractor to be entered into the system. DEP joined CWC on a number of calls to work on a solution. It was ultimately suggested by DEP for CWC to not enter the actual contract value into the system but instead just put what the system would allow. CWC told DEP we were not comfortable with solution. Over time, additional issues arose with getting contractors through the system.

After many months, DEP indicated to CWC that in fact, the process CWC was attempting to do to get contractors approved was actually impossible to complete based on the structure of the Shokan contract and the system itself. Recall the conditions from the December 2nd letter that required CWC to transfer funds from other contracts and include interest earnings towards the project. Ironically, these conditions

resulted in errors in the PASSPort system that would not allow CWC to enter contract values that exceeded the funding provided by DEP for the project. The transfers from other contracts and the inclusion of interest were not able to be accounted for in the system and could not be overridden.

For nearly seven months a number of contractors who bid on the Shokan construction work were unable to be provided “Notices to Proceed” from the Town of Olive. CWC recommended holding those contract documents until those contractors were approved by DEP, per our contract requirements. DEP was unable to provide any review or approval due to their system issues. This caused significant stress and questions for the project contractors and engineers. How could a contractor be expected to hold bids with no formal approvals for seven months?

Eventually, DEP and CWC agreed to do yet another contract amendment to change the contractor approval process from the PASSPort system to a one-page contractor approval form. This negotiation also took much longer than needed. DEP maintained that certain PASSPort requirements must remain but that contractors who were not in the system could utilize another method. CWC refused this inefficient solution and ultimately were able to get DEP to agree to a simple review process for contractors not yet approved in PASSPort. Once agreed upon, the new process took less than 5 days from start to finish to complete, compared to the multiple months needed under the PASSPort system. CWC strongly and emphatically recommend the one page contractor approval form as the default process for future CWC contracts based on the indisputable efficiency and time savings through this method.

Final Assessment

The Shokan project reflects a consistent pattern in which CWC worked to keep the Shokan Project advancing despite financial, contractual, and administrative hurdles.

CWC's actions included:

- Identifying the funding shortfall immediately after bid receipt.
- Proactively and voluntarily approving Board resolutions and funding strategies.
- Committing up to \$10 million from the CWC economic development fund the Catskill Fund for the Future to avoid project delay.
- Working with the Town of Olive to preserve bid validity.
- Negotiating multiple contract amendments and funding mechanisms with DEP.
- Pressing for timely contractor approvals and administrative decisions.
- Continuing to address compliance, procurement, and construction issues as they arose.

The record also reflects recurring challenges associated with DEP funding approvals, contract amendments, reimbursement commitments, contractor approval procedures, and administrative processes. These issues required repeated follow-up by CWC and frequently resulted in extended negotiations before necessary approvals could be secured. As a result, significant staff time and organizational resources were devoted not only to delivering the project itself, but also to overcoming administrative and funding-related obstacles that arose throughout implementation. Although the project progressed, the process was marked by inefficiencies and presented considerable challenges.

Community Vitality Study

As part of the Revised 2017 Filtration Avoidance Determination (FAD), CWC was tasked with administering and overseeing a Community Vitality Study intended to evaluate the economic and demographic conditions of watershed communities. After extensive delays, a \$500,000 contract registered at the City on September 17, 2025, roughly 3 years after the issuance of the Revised FAD, and notably after significant work was completed by CWC's consultant. These delays resulted in CWC once again fronting funding to assist the City in meeting their obligations under the FAD.

Although CWC successfully completed the required work, the contract ultimately failed to fully compensate our organization for the administrative and staff resources necessary to carry out the study. CWC invoiced approximately \$300,000 under the contract and returned the remaining balance to New York City. Prior to doing so, CWC documented that its administrative costs exceeded the \$50,000 available for administration based on the substantial staff time and effort required to manage the project. As part of our extensive efforts, CWC coordinated numerous Watershed stakeholder meetings, ensuring significant participation by as many stakeholders as possible, in as transparent a way as possible. CWC requested additional reimbursement for these costs; however, DEP denied the request.

CWC further noted that the contract contained language allowing interest earnings to be applied toward eligible administrative expenses. CWC's interpretation was that this provision provided a mechanism to recover legitimate administrative costs incurred in fulfilling the contract and in keeping with prior practices. DEP disagreed, asserting that despite the contract language differing from prior agreements, the provision should not be interpreted in a manner inconsistent with other contracts. As a result, CWC was required to absorb a portion of the actual costs associated with delivering a study that was itself a mandated FAD requirement. Given the relatively modest dollar value in dispute, CWC elected not to pursue litigation, submitting the dispute to the Watershed Protection and Partnership Council, or an extended contractual dispute. Nevertheless, the outcome remains concerning, as CWC performed the required work and was not fully reimbursed for expenses it believes were both necessary and contractually eligible.

CWC's concerns regarding DEP's management of this initiative were further compounded in late 2025 when the organization learned that DEP had independently funded a separate Community Vitality Study at a cost of \$1 million. This effort was undertaken without consultation or collaboration with CWC or other watershed stakeholders who had participated in the original study process. The existence of a second study raised significant questions regarding DEP's transparency, and in their commitment to the stakeholder-driven process established under the FAD.

This concern was heightened by the fact that DEP had imposed extensive requirements during the development of the CWC study, including a lengthy debate over the inclusion of a control group against which watershed communities could be measured. DEP maintained that such comparative analysis was essential to the study's design and contributed to delays in finalizing the scope of work. Ironically, based

on the information later made available, DEP's independently funded study did not appear to incorporate a comparable control-group methodology despite DEP's prior insistence that such an element was critical.

From CWC's perspective, the contrast was difficult to reconcile. DEP declined to reimburse a relatively small amount of documented administrative expense incurred by CWC while administering the FAD-mandated study, yet they funded a separate effort at approximately four times the cost of the original project that including little to no local stakeholder engagement. More troubling was the lack of transparency surrounding that expenditure or results of the study. Despite repeated requests directly to DEP, and discussions at the CWC Policy Committee level, DEP declined to provide meaningful information regarding the scope, methodology, findings, or supporting documentation associated with the study.

Ultimately, after considerable deliberation, in April, 2026 the CWC Policy Committee was forced to take an extraordinary step and authorized the Executive Director to submit a Freedom of Information Law (FOIL) request to obtain information regarding a project that directly concerned watershed communities and was closely related to the subject matter of the original Community Vitality Study. The need to pursue a FOIL request in order to obtain records associated with an initiative focused on partnership, transparency, and community vitality represented a significant breakdown in the collaborative relationship that has traditionally defined watershed programs. CWC's FOIL request is included as Attachment D and remains pending as to the scope of the project and invoices. Per DEP FOIL system, a response will be provided by August 24, 2026.

The City's eventual response is provided as Attachment D-1 as representing the "full extent" of the study. According to the records provided, the deliverables from this approximately \$1 million effort consisted primarily of two PowerPoint presentations. The limited nature of the materials produced, combined with the absence of meaningful stakeholder engagement and the reluctance to share information voluntarily, left CWC with significant concerns regarding the stewardship of public funds, transparency in decision-making, and DEP's commitment to a collaborative watershed partnership model.

Overall, while CWC successfully fulfilled its obligations under the Community Vitality Study contract, DEP's administration of the contract was characterized by delayed contract registration, reimbursement disputes, inconsistent application of contract provisions, limited transparency, and a lack of meaningful collaboration on related initiatives. These issues collectively undermined the spirit of partnership that the study was intended to promote and continue to serve as a source of significant frustration for the organization.

2025 Side Agreement

The 2025 Side Agreement was executed in December 2025 and represented a significant commitment by the signatory stakeholders to advance several critical watershed infrastructure investments. Among the agreed upon initiatives were \$3 million for CWC's Future Stormwater Program, \$10 million in wastewater treatment plant upgrades, \$25 million for inflow and infiltration mitigation projects, and \$5 million for the construction of septage acceptance facilities at local wastewater treatment plants.

Despite these commitments, progress toward implementation has been disappointing. As of July 16, 2026 more than seven months after execution of the agreement, not one of these initiatives has been formalized through an executed contract. The lack of progress has created growing concern regarding the ability to translate negotiated commitments into tangible projects and public benefits.

The most developed of these efforts is the approximately \$3 million contract for CWC's Future Stormwater Program. Even this relatively modest agreement remains unfinished after more than seven months of negotiations. Particularly frustrating is the fact that the contract currently under negotiation differs substantially from what CWC understood had been agreed to during Side Agreement discussions.

During negotiations, CWC agreed to pursue a contract amendment to add additional funding to an existing and highly successful program. That agreement was reached with the understanding that the established contractual framework, which has effectively governed CWC programs for nearly three decades would remain intact. Following execution of the Side Agreement, however, DEP informed CWC that an amendment to the existing contract as agreed upon in the Side Agreement was not possible, requiring a new contract instead. The resulting draft agreement contained numerous provisions and requirements that do not exist in prior CWC contracts and were not anticipated during the Side Agreement negotiations.

While CWC has worked diligently and in good faith to address these issues and move the agreement forward, the process has been far more complicated and time consuming than expected. Considerable effort has been spent attempting to preserve the proven contractual structure and CWC independence that has successfully delivered stormwater management programs for nearly 30 years. The amount of time required to advance a relatively small contract raises legitimate concerns about the pace at which the remaining Side Agreement commitments can realistically be implemented.

Recognizing the importance of moving projects forward, CWC made the Future Stormwater Program contract a top priority and repeatedly communicated its urgency to DEP. Similarly, CWC has requested that DEP expedite development of the Septage Acceptance Program agreement because at least one participating municipality is approaching completion of its facility design and will soon be prepared to move toward construction.

Based on the delays experienced in obtaining draft agreements, the length of the negotiation process, and CWC's extensive experience with contract registration and funding timelines, there is increasing concern

regarding the availability of funds needed to keep these projects on schedule. CWC fully anticipates the possibility that municipalities may again request CWC to advance funds from the Catskill Fund for the Future (CFF) to pay for project costs while awaiting contract approval and reimbursement. Such an outcome would require CWC to commit additional resources from an already limited Economic Development funding pool, potentially reducing the amount of capital available for other watershed priorities. The purpose of CFF is not to advance monies for programs that DEP agreed to fund. The purpose of CFF is reduce and relieve adult unemployment in the Watershed through loans to qualified businesses.

However, the alternative of unfunded commitments is equally concerning. If projects are delayed until contracts are fully executed and funds become available, ongoing inflation and construction cost escalation could substantially increase project costs. In some cases, these increases could exceed the funding levels contemplated and agreed upon during the Side Agreement negotiations, ultimately necessitating additional funding commitments.

Neither outcome reflects the intent of the 2025 Side Agreement. The Agreement was designed to accelerate investment in critical watershed infrastructure, not create circumstances in which watershed partners must choose between fronting scarce funds or delaying needed environmental improvements. While the commitments made in the Side Agreement remain valuable and important, the pace of implementation to date has been well below expectations. Going forward, a more efficient, predictable, and collaborative contracting process will be essential if the objectives of the agreement are to be achieved within a reasonable timeframe and without imposing unnecessary financial burdens on local stakeholders.

Other Contracts and Summary

The remaining contracts and program areas reviewed by CWC generally functioned effectively throughout the evaluation period. While routine administrative and operational challenges continued to arise, none were of a magnitude that significantly affected program performance or warranted the level of concern identified in other sections of this evaluation. The Septic Rehabilitation and Replacement Program, Flood Hazard Mitigation Program, Future Stormwater Program, Public Education Program, and Operating Contracts were all administered with comparatively fewer difficulties and less administrative burden than the programs previously discussed.

That said, several longstanding concerns continue to persist across these contracts. These include maintaining adequate on-hand funding levels, delays in invoice processing and reimbursement, contract interpretations, voluminous scanning and upload requirements, extended insurance verification timelines, and inefficiencies associated with contractor and subcontractor approvals. In addition, PASSPort continues to create administrative challenges that frequently result in delays, duplicative efforts, and increased staff time devoted to contract administration.

As discussed in the cover letter accompanying this report, CWC's experience during FY26 reflected both encouraging progress and continued frustration. On the positive side, several contracts have ultimately been extended beyond their original terms and funded above their initial contract values when operational needs justified such action. Similarly, DEP has, in some instances, recognized the necessity of maintaining higher on-hand funding thresholds and has successfully processed amendments to address those needs. CWC also appreciates the willingness shown by some DEP staff to utilize more practical approaches to subcontractor approvals, including the simpler and quicker Business Integrity Form process, which proved to be significantly more efficient than traditional PASSPort procedures.

However, these successes often occur only after prolonged discussions, repeated requests, and extended delays. CWC continues to encounter situations in which requests for contract extensions, funding adjustments, or higher on-hand funding levels are initially denied despite years of operational experience demonstrating their necessity. Likewise, CWC remains concerned that future contracts may revert to less efficient administrative requirements despite the demonstrated success of simpler alternatives. The challenge is not whether solutions can ultimately be found, but rather the amount of time, effort, and uncertainty required to reach outcomes that experience has repeatedly shown to be necessary.

CWC remains committed to maintaining a constructive and collaborative working relationship with DEP and believes that both organizations share the same ultimate goal of effective program delivery and watershed protection. Achieving that goal, however, will require a greater willingness to reconsider increasingly cumbersome administrative practices, proactively address recurring issues, and build upon approaches that have proven successful over the past three decades. CWC takes no satisfaction in documenting operational inefficiencies and remains ready to work collaboratively toward practical solutions. We respectfully ask DEP to demonstrate the same commitment to continuous improvement and

partnership so that future contract administration can be more efficient, predictable, and beneficial to all parties involved.

Attachment A



July 6, 2023

Jason Merwin, Executive Director
Catskill Watershed Corporation
669 County Highway 38, Suite 1
Arkville, NY 12406

Dear Jason,

Thank you for meeting last week to discuss future options for the Cluster Septic System Program, including the possibility of the Catskill Watershed Corporation (CWC) initiating feasibility studies for some or all of the 13 eligible communities. No community has elected to participate in the Cluster Program in the 13-year history of this program being available and identified failing septic systems in cluster areas have been remediated through other programs. Since there has not been a demonstrated need for cluster systems, the Revised 2017 FAD requires DEP to work with CWC to conclude the standalone Cluster Program and explore options for utilizing Cluster Program funds for eligible septic projects, including cluster systems should future projects materialize.

As we discussed, the Cluster Program has funding earmarked through two separate DEP contracts: the older CAT-355 Septic III capital contract provides \$2 million for the implementation of cluster systems, while the recent CAT-484 Septic V expense contract provides \$1 million for the operation and maintenance of cluster systems. Because the CAT-355 contract is capitolly funded, there are limitations on the use of those funds pursuant to Comptroller Directive 10, which explicitly states "feasibilities studies and other work undertaken to determine whether or not a project can or should take place" are not capitolly eligible.

While the CAT-355 contract does allow for completion of a Study Phase Report to evaluate whether a sewer extension or cluster project is the least costly option for a community, the contract stipulates that eligible communities shall first enter into a participation agreement with CWC that includes definitive timeframes for each stage of a cluster project and lists both the eligible and ineligible costs for implementing the project. Based on the Study Phase Report and with DEP approval, CWC would select the least costly option and use implementation funding available through the applicable program agreement. In other words, although the concept of a study phase is allowable under the CAT-355 contract, such a phase is only eligible for capital funding if it directly leads to the construction of an eligible sewer extension or cluster project (defined by the contract as involving multiple properties and some form of common ownership for wastewater collection and treatment). In the event CWC were to initiate feasibility studies without an eligible community first signing a participation agreement that ensures the cluster project will advance to completion within a definitive timeframe, that approach has the potential to expend capital funds in a manner that is not eligible based on Comptroller Directive 10.

Rohit T. Aggarwala
Commissioner

Paul V. Rush, P.E.
Deputy Commissioner

71 Smith Avenue
Kingston, NY 12401

Tel: (845) 340-7800
Fax: (845) 334-7175
prush@dep.nyc.gov

In addition to capital eligibility restrictions, we also discussed some of the requirements contained in CWC's Cluster Program Rules. DEP notes that upon being solicited for participation in the Cluster Program, towns have two months to indicate in writing whether they are interested or disinterested in program participation; if interested, towns must pass a resolution to this effect and indicate a willingness to form a sewer district (which further assures capital eligibility for the overall cluster project). If a town response is not received within two months, the Program Rules state that CWC shall consider that community disinterested and no cluster system will be provided. As we discussed at the onset of our meeting, the original intent for the Cluster Program was to provide an additional tool for septic repairs. Since the Cluster Program was established septic repair opportunities have expanded significantly, to now include all residential properties throughout the entire west of Hudson watershed as well certain commercial, non-profit and governmental properties. It is worth considering, given the ongoing lack of interest from eligible communities coupled with the enhanced opportunities for septic repairs through other programs, that the Cluster Program is simply an outdated alternative option for which there is no real or apparent need.

DEP appreciates that CWC is being proactive by exploring future options for the Cluster Program. As we discussed, one option may be to close out the CAT-355 contract and explore whether an amendment to the Septic V contract might be needed to continue offering a Cluster Program option to certain eligible communities, should future projects materialize. As noted yesterday, DEP is willing to discuss these potential next steps with CWC sometime in 2024, allowing both parties to address other priorities in the interim while further monitoring and assessing community interest in the existing Cluster Program based on the emergence of new septic failures if/when they arise.

Sincerely,

David S. Warne
Assistant Commissioner



Catskill Watershed Corporation

669 County Route 38 • Box 1 • Arkville, NY 12406

Tel: (845) 586 -1400

Fax: (845) 586 -1401

Website: www.cwconline.org

* Please note that the above mentioned address has been revised to **669 County Hwy 38 • Suite 1 • Arkville NY, 12406**

July 12, 2023

David Warne, Assistant Commissioner
New York City Department of Environmental Protection
78 Smith Ave
Kingston, NY 12401

Re: *Catskill Watershed Corporation Cluster Septic System Program*

Dear *Dave* Mr. Warne:

The Catskill Watershed Corporation (CWC) acknowledges receipt of your letter dated July 6, 2023. CWC appreciates meeting with you and John Schwartz to brainstorm on options to improve the CWC Cluster Septic System Program.

As you correctly note, CWC is the program administrator for the CWC Septic Program, funded by a series of contracts between CWC and New York City Department of Environmental Protection (DEP). The Septic III contract expanded the base septic program to include a cluster septic program for certain enumerated communities. If a septic system in a listed community is identified by CWC as eligible for the Septic Program because it is failing or reasonably likely to fail, CWC then contacts the town where the community is located. If the town agrees to participate in the Cluster Septic Program, CWC investigates surrounding properties for other septic systems that may be eligible for the CWC Septic Program and hires an engineering consultant to propose a community-wide solution.

This process is similar to the CWC Community Wastewater Program just on a smaller scale and with one exception. In 1999, DEP funded feasibility studies through the Environmental Facilities Corporation (EFC) for each of the Community Wastewater communities. Those studies proposed a service area for each community as well as a possible project. When the CWC CWMP consultant commenced their work, these EFC studies were the starting point. No such studies exist of the Cluster Septic Program communities.

The success of the CWC CWMP program demonstrates that the watershed communities support community wide wastewater solutions. No CWMP community has turned down a project in the 19 years of that program. CWC strongly believes having an EFC style study in place for each of the identified communities would present a clearer potential project when a town considers its participation in the CWC Cluster Septic Program.

CWC requested a reevaluation of the program to discuss the current process and impediments, specifically the timing and trigger for a study of proposed community solutions. Until our meeting, CWC was unaware of the New York City Comptroller Directive 10 and the limitations it places on DEP even funding feasibility

studies. I do note that the study we have proposed would not be “undertaken to determine whether or not a project can or should take place” but rather would outline possible project(s) that could be undertaken in each of the listed communities, identical to the EFC studies for the CWC CWMP. The completion of the studies could also be prioritized by agreement of CWC and DEP.

Although, as you noted, no community thus far has agreed to move forward with a Cluster System project, CWC is concerned about the negative impacts of Directive 10 you detail in your letter. The revelations of Directive 10’s impact and the town’s required commitment to complete a project prior to knowing what the project will be may severely limit the ability to move forward with a project if one is desired. The Septic III contract was negotiated under the same premise as the CWMP program which allows a community to “pull out” at any point prior to the construction phase. If DEP’s position is that Directive 10 supersedes our executed contract, CWC believes at a minimum, a certain amount of Septic III capital funds be repurposed as expense funds to allow for the studies to commence as originally envisioned. CWC has also suggested amending and increasing funding for the Septic V to allow the expense eligible costs to run through that contract.

DEP staff also noted, and CWC agrees, that the current Septic Program Rules could be modified to allow for funding of managed repairs if an eligible septic system is identified in a Cluster Septic Program. As you are aware, only a handful of failures in these cluster septic communities have been identified to date. In certain identified areas, including Shokan, Middletown and Neversink, the Towns indicated the reason for not moving forward was the desire to not impede a property owner from obtaining immediate funding to repair or replace their septic system. This may alleviate some concern by towns that the process would harm the eligible property owner by delaying their septic repair.

CWC continues to believe there is potential to utilize the Cluster Septic System Program throughout the Watershed. Since the issue was first raised to CWC about the possibility of doing away with the program, we have worked to be proactive in finding solutions to existing barriers. Certain steps have been taken over the years to help create a more attractive program. CWC is committed to continue working towards improvement of the program to make it viable and attractive for potential applicants. Lastly, the list of communities may also be worth future examination. CWC notes there may be other areas of significant concern that may be worthy of inclusion into the program. Without adding additional hurdles to the process, CWC is open to evaluating the list of communities with DEP if there is appetite to do so.

We look forward to continued discussions on this important program. Thank you.

Very truly yours,



Jason Merwin
Executive Director

Attachment B



December 23, 2025

Edward P. Wasserman
210 West 11th Street
New York, NY 10014

Rohit T. Aggarwala
Commissioner

Re: Stonewall Glen Stormwater Structures
South Street; Town of Windham; Greene County
Tax Map No.: 95.07-1-97
Schoharie Reservoir Drainage Basin
DEP Log # 2005-SC-1154-SP.1

Dear Edward P. Wasserman:

Please be advised that the permanent stormwater controls for the above-mentioned project have yet to be constructed. As the drainage area to stormwater structure 4 has been fully developed including the structures, driveway, tennis courts, etc., the modified stormwater structure 4 must be constructed as soon as weather permits. Currently, uncontrolled stormwater runoff is discharged from the site without treatment or attenuation.

Stormwater structure 1 also must be constructed. However, only a small portion of the area has been developed that drains to structure 1. As the drainage to structure 4 is fully developed, construction of stormwater structure 4 should be the priority

Please provide a written schedule for the completion of stormwater structures 1 and 4. If you have any questions regarding this matter, please contact me at (845) 340-7226.

Sincerely,

James Watkins
Associate Project Manager
Kingston Project Review

c: Scott Ouimet, PE – Kaaterskill Associates
Chris Costello, PE – DEP
Rebecca Mitchell – NYSDEC
Rachael Burger – CWC
Code Enforcement Officer, Town of Windham
Ryan Martin - Contractor

Paul V. Rush, P.E.
Deputy Commissioner

Bureau of Water Supply
prush@dep.nyc.gov

71 Smith Avenue
Kingston, New York
12401

T: (845) 340-7800
F: (845) 334-7175

Attachment C



November 26, 2025

Jason Merwin
Executive Director
Catskill Watershed Corporation
669 County Hwy 38, Suite 1
Arkville, NY 12406

Rohit T. Aggarwala
Commissioner

Paul V. Rush, P.E.
Deputy Commissioner

PO Box 358
Grahamsville, NY 12740

Tel. (845) 340-7800
Fax (845) 334-7175
prush@dep.nyc.gov

Dear Mr. Merwin:

As you are aware, the bids for the Shokan Wastewater Treatment Plant (WWTP) have been received, and the apparent low bids for the project components exceed the approved budget, even with the increased commitment DEP made last summer.

As outlined in my August 2024 letter, DEP anticipated this possibility and committed to working collaboratively with CWC and the Town to identify opportunities to reduce scope and/or cost. I understand that you recently met with Shilo Williams to explore potential cost-saving measures, including evaluating an alternative brand MBR technology, applying accrued interest toward funding the gap, and allocating funds designated for the Cluster Program to the Shokan WWTP. I appreciate your openness to exploring these opportunities and your willingness to work together on solutions.

DEP is committed to identifying funding for the remaining \$4,600,000.00 funding shortfall, provided that:

- CWC agrees to allocate \$1,000,000.00 from the Septic III contract to the Shokan WWTP
- CWC agrees to allocate \$500,000.00 from the Septic V contract to the Shokan WWTP
- DEP agrees to meet with CWC and DOH ahead of FAD negotiations to discuss a reimagined Cluster Program
- All current and future accrued interest will be applied to the project, and
- CWC will continue to pursue all reasonable cost-saving opportunities

DEP remains fully committed to seeing this project through to completion. We appreciate the CWC Board's approval to utilize CFF funds to keep the project moving forward while DEP works to secure the additional funding. We look forward to the continued collaboration with CWC and the watershed communities to bring this important project to completion.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rohit T. Aggarwala'.

Rohit T. Aggarwala

Cc: Tina Mole, Chair CWC Board
Paul Rush, Deputy Commissioner
Shilo Williams, Assistant Commissioner

Attachment C-1



Rohit T. Aggarwala
Commissioner

Paul V. Rush, P.E.
Deputy Commissioner

PO Box 358
Grahamsville, NY 12740

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prush@dep.nyc.gov

December 4, 2025

Jason Merwin, Executive Director
Catskill Watershed Cooperation
669 County Highway 38, Suite 1
Arkville, NY 12406

Re: Amendment to Prior Letter Agreement-Shokan WWTP Project

Dear Jason,

This letter serves as an amendment to our prior correspondence regarding the Shokan WWTP project. The purpose of this amendment is to memorialize NYCDEP's agreement, in writing, to the following terms:

- **Block Grant Approval:** NYCDEP shall approve a block grant in an amount not to exceed Ninety Million Dollars (\$90,000,000.00).
- **Amendment to Shokan Project Agreement:** NYCDEP shall amend the Shokan Project Agreement to reflect the revised block grant approval.
- **Reimbursement to CWC:** NYCDEP shall reimburse the Catskill Watershed Corporation (CWC) for amounts expended from the Catskill Fund for the Future in connection with the Shokan WWTP Project.

This amendment is intended to ensure clarity and alignment between NYCDEP and CWC regarding the financial and contractual obligations associated with the Shokan WWTP project.

Please accept this letter as formal notice of the amendment, and kindly include it in your records for the Shokan WWTP project.

Sincerely,

Shilo Williams
Assistant Commissioner
NYCDEP

Attachment D

www1.nyc.gov/account/user/profile.htm?[rue&target=aHR0cHM6Ly9hODYwLW9wZW5yZWNVcmRzLm55Yy5nb3YvcnVxdWVzdC92aWV3L0ZPSUwtMjAyNi04MjYtMDE2ODE=\)](#)

Open RECORDS

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Title:

McKinsey Report - NYC Watershed

Description:

The Catskill Watershed Corporation requests the following documents:

1. All reports/studies/playbooks and addendums by McKinsey & Company received by NYCDEP and/or the City of New York between January 1, 2020 and April 7, 2026 concerning the New York City Watershed.
2. Copies of all invoices paid by NYCDEP and/or the City of New York for work completed by McKinsey & Company for reports/studies/playbooks and addendums between January 1, 2020 and April 7, 2026 concerning the New York City Watershed.
3. Scope of Work for all reports/studies/playbooks and addendums sent to McKinsey & Company by NYCDEP and/or the City of New York between January 1, 2020 and April 7, 2026 concerning the New York City Watershed.

Response can be sent to: timothycox@cwconline.org

Thank you.

-Timothy Cox

Corporate Counsel

Catskill Watershed Corporation

Tel:845-586-1400 x102

Open

Department of Environmental Protection (DEP)

Due Date:

08/24/2026

Contact the Agency

Responses ?

1

ACKNOWLEDGMENT

Wednesday, 04/08/2026 at 12:29 PM

Add Note ?

Note Content

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Submit

Attachment D-1

From: Williams, Shilo <shiwilliams@dep.nyc.gov>

Sent: Tuesday, April 21, 2026 8:40:58 AM

To: Jason Merwin <merwin@cwconline.org>; Ric Coombe <rcoombe@granitelp.com>; ryannaatz <ryannaatz@nycwatershed.org>; shelly.johnson <shelly.johnson@co.delaware.ny.us>; Tina B. Mole <tina.mole@co.delaware.ny.us>

Subject: McKinsey Report

Good morning,

Attached are the deliverables from the McKinsey study. We look forward to participating in the workgroup and collaborating on these initiatives and other ideas as this effort moves forward.

Best regards,

**Shilo Williams | Assistant Commissioner | NYC Environmental Protection
Bureau of Water Supply, Source Water Protection
(o) 845-771-1101 | (m) 917-842-1177 | shiwilliams@dep.nyc.gov**

Attachment E

2026 Construction Approval: Design Time Review

Watershed Wide								
Construction Approval Year	2019	2020	2021	2022	2023	2024	2025	2026
Avg Days from Design Rec'd to Approved	23.4	21.2	28.6	50.3	54	60.8	56.3	61.4
Avg Days from Deemed Complete to Approved	10.8	9.8	12.2	26.8	24.9	34.6	29.4	39.36
Total over 45 Days	10	11	22	34	32	44	29	44

Kingston								
Construction Approval Year	2019	2020	2021	2022	2023	2024	2025	2026
Avg Days from Design Rec'd to Approved	39	30.8	45.4	54.7	73.7	64.1	47.4	74.98
Avg Days from Deemed Complete to Approved	16.1	17.8	22.3	31.6	28.3	28.9	20.5	41.35
Total over 45 Days	6	7	15	18	13	15	5	15

Arkville								
Construction Approval Year	2019	2020	2021	2022	2023	2024	2025	2026
Avg Days from Design Rec'd to Approved				53	42.3	63.6	60.5	54.22
Avg Days from Deemed Complete to Approved				26.4	22.9	41.9	33.7	38.91
Total over 45 Days				16	19	29	24	29

Grahamsville								
Construction Approval Year	2019	2020	2021	2022	2023	2024	2025	2026
Avg Days from Design Rec'd to Approved	15	13.8	15.9	9.5	13	13		0.5
Avg Days from Deemed Complete to Approved	8	3.7	6.4	1.1	2.1	2.1		0
Total over 45 Days	4	4	7	0	0	0		0

