



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

Mr. Abraham Franklin
Watershed Protection Section
Surface Water Quality Bureau
New Mexico Environmental Department
1190 St. Francis Drive
Santa Fe, NM 87502

Dear Mr. Franklin:

We have completed our review of the second draft of the Watershed Based Plan for the Rio Pueblo de Taos, a 12-digit HUC watershed-based plan (WBP) addressing the Environmental Protection Agency's (EPA) nine key elements for effective watershed based plans. This version of the plan, received in February 2013, addresses EPA's comments on the initial WBP received in December of 2012.

EPA appreciates the efforts of the Amigos Bravos watershed group and the New Mexico Environmental Department (NMED) to prepare this WBP, as well as the timely manner in which our original comments were addressed. The Rio Pueblo de Taos (RPT) WBP is designed to address existing water quality impairments for the nonpoint source (NPS) pollutants temperature and sedimentation and provides new information to supplement a 2004 TMDL for the RPT. Bacteria and nutrients are also impairments in the watershed, but they will be addressed in a future revision of the WBP.

Our review of the December 2012 version of this WBP noted that the plan did not sufficiently satisfy EPA's nine key elements. In particular, the elements dealing with identification of the sources and causes of NPS pollution, expected load reductions, management measures, technical and financial assistance and monitoring were in need of further detail in order to meet the nine key elements. The February 2013 version of this WBP was revised according to EPA recommendations and the plan is significantly improved. However, there is still insufficient information in the identification of causes and sources of NPS pollution in the watershed and the expected load reductions from these sources.

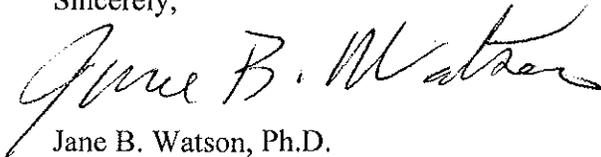
The WBP does list several sources of NPS pollution in the watershed and cites loss of canopy cover as the major source of temperature and sediment loadings. Insufficient canopy cover is not a source of NPS pollution but is instead a symptom of other sources of NPS pollution such as grazing in riparian areas, flow alteration, road and vehicle damage, and channelization. The WBP does mention these NPS pollutant sources but it does not sufficiently identify their location and extent in the watershed as detailed in EPA's guidance for watershed planning. Instead, the canopy cover throughout the watershed is identified as the source of temperature and sediment loadings. While canopy cover information is useful and could serve to target effective implementation of management measures, it does not detail the location and extent of the ultimate sources of the temperature and sediment loadings. For example, it is unclear how much of the current temperature and sediment loadings are due to grazing in riparian areas versus how much may be due to road runoff, water irrigation withdrawals, or streambank erosion and channel widening. This information is necessary in order to sufficiently satisfy the first element of effective watershed planning and to

effectively target management measures and implement adaptive management strategies in the event that load reductions are not achieved.

Further detail is also needed in the second element dealing with expected load reductions from managing the sources of NPS pollution identified in the first element. While the plan clearly links increases in canopy cover with significant decreases in pollutants, it needs to link the specific sources of NPS pollutants to expected pollutant load reductions. EPA recommends the plan be revised to identify load reduction estimates for each NPS source at the subwatershed level. For example, the WBP should provide estimates of how much canopy cover increase would be expected from reduction of riparian grazing or from streambank restoration in each segment of the watershed. This would then allow for an estimate of the total temperature and sediment load reduction attributed to the management of each specific NPS source (e.g., the temperature load reduction expected from riparian grazing; eroded streambanks, etc.).

While we cannot accept this WBP in its current form, we hope to see these issues addressed in a future revision. Overall, the plan is well written and will likely lead to successful restoration of water quality in the RPT. Once the additional details are included, we will be able to move forward with an acceptance of this plan and this watershed will become eligible for CWA Section 319 funding for watershed implementation projects consistent with this WBP and the Surface Water Quality Bureau's Nonpoint Source Management Plan. If you or your staff has any questions regarding our review, please contact Brian Fontenot of my staff at 214-665-7286.

Sincerely,



Jane B. Watson, Ph.D.
Associate Director
Ecosystems Protection Branch

cc: James Hogan, NMED