



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

30 JUN 2004

Reply To

Attn Of: OW-134

Toni Hardesty, Administrator
State Water Quality Program
Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

RE: Approval of Willow Creek Subbasin TMDLs (Hydrologic Unit Code 17040104)

wrong HUC ID
17040205

Dear ^{Toni}Mr. Hardesty:

The U.S. Environmental Protection Agency (EPA) is pleased to approve the sediment, temperature and nutrient Total Maximum Daily Loads (TMDLs), as listed in the attached table, for the Willow Creek Sub-basin, as submitted on June 1, 2004. This approval only includes those waters for which a TMDL was completed and does not constitute approval for de-listing of waters within Hydrologic Unit Code 1704104 from the Idaho 1998 §303(d) list. Any proposed de-listing of waters will be considered at the time of submission of the next §303(d) list of impaired waters.

EPA appreciates the cooperation and work of Melissa Thompson on this TMDL, especially the coordination prior to the public comment period and the sharing of a pre-public comment draft with EPA staff. We support this sort of early involvement and believe it results in a better understanding of the approaches used to develop the TMDL and enables meaningful discussions to occur between Idaho and EPA staff that can later expedite EPA's review of the final document. We also note that recent IDEQ TMDLs have included a very concise and clear executive summary. This executive summary, in particular, nicely describes the land use problems that are causing impairment in the various creeks that comprise this sub-basin.

The June 1, 2004, submittal also includes the Implementation Strategies for the TMDLs. The strategies were developed and submitted pursuant to the TMDL Settlement Agreement of July 2002. EPA currently has no duty to approve or disapprove Implementation Strategies under Section 303(d) of the Clean Water Act (CWA) and therefore, EPA is not taking action on them. However, we believe implementation is the critical next step for realizing improvements in water quality called for in the TMDL and encourage IDEQ to continue their work with appropriate parties and agencies on implementation. We suggest that future TMDLs include temperature surrogates, such as levels of shade necessary to meet the temperature targets. We have found that expressing the TMDL targets in this manner can help explain to the public the nature of the problem that is resulting in impairment (i.e., absence of shade and degraded riparian habitat) and provide a description of what is needed to restore the stream. It also provides a measurable indicator that landowners can use to assess the current condition of their land, and evaluate progress over time as a result of restoration.

By EPA's approval, these TMDLs are now incorporated into the State's Water Quality Management Plan under §303(e) of the Clean Water Act. If you have any comments or questions, please feel free to call me at (206)553-1261, or you may call Tracy Chellis of my staff at (206)553-6326.

Sincerely,



Michael F. Gearheard
Director
Office of Water

cc: Steve Allred, IDEQ Director
Doug Conde, IDEQ Attorney General
Mike McIntyre, IDEQ Surface Water Program Manager
Marti Bridges, IDEQ TMDL Program Manager
Troy Saffle, IDEQ, Idaho Falls Regional Office Water Quality Manager
Melissa Thompson, IDEQ, Water Quality Analyst, Idaho Falls Regional Office

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**Department of Environmental Quality
State Water Quality Division**

Waterbody and Boundaries	Assessment Unit(s) of ID 17040205	Pollutant
Brockman Creek Headwaters to Grays Lake Outlet	SK024-02 SK024-03 SK025-02 SK025-03	Sediment
		Temperature
Buck Creek Headwaters to Mill Creek	SK012-02	Sediment
Corral Creek Headwaters to Brockman Creek	SK026-02	Sediment
		Temperature
Crane Creek Headwaters to Willow Creek	SK014-02	Sediment
Grays Lake Outlet Grays Lake to Willow Creek	SK016-04 SK017-04 SK019-04	Temperature
Hell Creek Headwaters to Grays Lake Outlet	SK029-02 SK029-03	Sediment
		Temperature
Homer Creek Headwaters to Grays Lake Outlet	SK018-02 SK018-03	Sediment
		Temperature
Lava Creek Headwaters to Grays Lake Outlet	SK028-02 SK028-03	Sediment
		Temperature
Meadow Creek Headwaters to Ririe Reservoir	SK032-02 SK032-03	Sediment
Mill Creek Headwaters to Willow Creek	SK012-02 SK012-03	Sediment
		Temperature
Rock Creek Headwaters to Willow Creek	SK005-02	Temperature
Sawmill Creek Headwaters to Brockman Creek	SK027-02	Sediment
		Temperature
Sellers Creek S FK Sellers to Willow Creek	SK010-02 SK010-03	Sediment
		Temperature
Seventy Creek Headwaters to Willow Creek	SK011-02	Sediment

Waterbody and Boundaries	Assessment Unit(s) of ID 17040205	Pollutant
Tex Creek Headwaters to Indian Creek	SK031-02 SK031-03	Sediment
		Temperature
Willow Creek Grays Lake Outlet to Ririe Reservoir	SK004-05 SK005-05	Sediment
		Temperature
		Nutrients
Willow Creek Sellers Creek to Grays Lake Outlet	SK008-04 SK005-04	Nutrients
Willow Creek Headwaters to Sellers Creek	SK011-04 SK013-03	Sediment
		Temperature
		Nutrients