REGION 10
SEATTLE, WA 98101

February 6, 2025

Dr. Mary Anne Nelson, Administrator
Surface and Wastewater Division
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Dear Dr. Nelson:

The U.S. Environmental Protection Agency has completed its Clean Water Act review of the Willow Creek Total Maximum Daily Loads for temperature, *Escherichia coli,* and total phosphorus, submitted by the Idaho Department of Environmental Quality on January 6, 2025. IDEQ's submittal includes new TMDLs to address seven impairments in the Willow Creek subbasin for temperature, *E. coli,* and total phosphorus (Table 1). In addition, IDEQ submitted eighteen revised temperature TMDLs using a different methodology (Table 2) and two revised nutrient TMDLs using new total phosphorus targets (Table 3).

Table 1. Newly Developed TMDLs for Impaired Waters

Name of Creek/Water Segment	Assessment Unit #	Pollutant
Willow Creek – Birch Creek to Bulls Fork	ID17040205SK005_05	Total Phosphorus[1]
Willow Creek – Mud Creek to Birch Creek	ID17040205SK008_02	Temperature and *E. coli*
Mill Creek – source to mouth	ID17040205SK012_03	*E. coli*[1]
Grays Lake – 1st- and 2nd-order tributaries	ID17040205SK021_02	Temperature
Gravel Creek – source to mouth	ID17040205SK023_02	*E. coli*
Brockman Creek—Corral Creek to mouth	ID17040205SK024_02	*E. coli*

[1] *newly identified impairment to be included in 2024 Integrated Report*

Table 2. Revised 2004 Willow Creek Temperature TMDLs Using Different Methodology

Name of Creek/Water Segment	Assessment Unit #
Willow Creek – Birch Creek to Bulls Fork	ID17040205SK005_02
Sellars Creek – source to mouth	ID17040205SK010_02
Willow Creek – Crane Creek to Mud Creek	ID17040205SK011_04
Mill Creek – source to mouth	ID17040205SK012_02
Willow Creek – source to Crane Creek	ID17040205SK013_02
Willow Creek – source to Crane Creek	ID17040205SK013_03
Homer Creek – source to mouth	ID17040205SK018_02

Homer Creek – source to mouth	ID17040205SK018_03
Grays Lake Outlet – Grays Lake to Brockman Creek	ID17040205SK020_04
Brockman Creek – Corral Creek to mouth	ID17040205SK024_02
Brockman Creek – source to Corral Creek	ID17040205SK025_02
Brockman Creek – source to Corral Creek	ID17040205SK025_03
Corral Creek – source to mouth	ID17040205SK026_02
Sawmill Creek – source to mouth	ID17040205SK027_02
Lava Creek – source to mouth	ID17040205SK028_02
Lava Creek – source to mouth	ID17040205SK028_03
Hell Creek – source to mouth	ID17040205SK029_02
Tex Creek – source to mouth	ID17040205SK031_02

Table 3. Revised Total Phosphorus Targets for the 2004 Nutrient TMDL

Name of Creek/Water Segment	Assessment Unit #
Willow Creek—Mud Creek to Birch Creek	ID17040205SK008_04
Willow Creek—Crane Creek to Mud Creek	ID17040205SK011_04

The EPA is approving the TMDLs that address twenty-seven impairments on these twenty-four assessment units. The TMDL project meets the statutory and regulatory requirements found in section 303(d) of the CWA and the EPA's implementing regulations at 40 C.F.R Part 130. The EPA's review indicates that the allocations have been established at levels that, when fully implemented, will lead to attainment of applicable water quality standards. As such, IDEQ does not need to include these waters on the next 303(d) list of impaired waters for temperature, *E. coli*, and total phosphorus.

IDEQ's submittal also includes an implementation strategy for the TMDL project. As you know, the EPA has no duty to approve or disapprove implementation strategies or implementation plans under section 303(d) of the CWA; therefore, the EPA is taking no action on the implementation strategy. Implementation is the critical next step to improve water quality, and the EPA encourages IDEQ to continue its work with responsible parties to implement the TMDL.

The EPA appreciates the work of Destiny Locke, Alex Bell, and Thea Wickersham in developing and completing the Willow Creek TMDL project for temperature, *E. coli*, and total phosphorus. The EPA also appreciates the continued cooperation by IDEQ as we work towards the common goal of addressing impaired waters in the state of Idaho.

If you have any questions on this agency action, please feel free to call me at (206) 553-0171 or have your staff contact Kati Carberry at (208) 373-5771 or by email at carberry.kathryn@epa.gov.

Sincerely,

HANH SHAW Digitally signed by HANH SHAW Date: 2025.02.06 15:29:38 -08'00'

Hanh Shaw
Manager, Standards, Assessment and Watershed Management Branch
Water Division

cc: Thea Wickersham, IDEQ mail to: (thea.wickersham@deq.idaho.gov)
Alex Bell, IDEQ mail to: (alex.bell@deq.idaho.gov)