



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

Reply To  
Attn Of: OW-134

**37 JUL 2004**

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

Re: Approval of the Goose Creek Subbasin Assessment and TMDL

Dear Mr. Hardesty:

The U.S. Environmental Protection Agency (EPA) is pleased to approve the sixteen Total Maximum Daily Loads (TMDLs) for the Goose Creek Watershed as submitted on December 30, 2003, and received by EPA on January 5, 2004.

The following Table contains EPA approved TMDLs for waterbodies on the 1998 Idaho 303(d) list.

<i>Waterbody Name</i>	<i>1998 303(d) Identification #</i>	<i>1998 303(d) list Pollutants</i>	<i>Pollutants for which TMDLs were developed</i>
Goose Creek	2447	Bacteria, DO, Nutrients, Flow Alteration, Sediment, Temperature	Temperature, Sediment-Bedload
Trapper Creek	2449	Bacteria, DO, Flow Alteration, Sediment,	Sediment, Nutrients
Birch Creek	2448	Bacteria, DO, Sediment	Nutrients, Bacteria
Cold Creek	5275	Unknown	Temperature
Beaverdam Creek	5277	Unknown	Nutrients, Temperature, Bacteria, Sediment, DO

It was determined during development of the TMDL that the waterbody segments in the following table were not meeting water quality standards and had not been previously included on the Idaho 303(d) list. The information contained in this TMDL demonstrates that these non-listed waters are in fact water quality limited and in need of a TMDL. The following table lists EPA approved TMDLs not on Idaho's 303(d)list.

<i>Waterbody Name</i>	<i>Pollutants</i>	<i>TMDLs Completed</i>	<i>Assessment Unit #</i>
Little Cottonwood Creek	not listed	Bacteria	000_02
Left Hand Fork Beaverdam Creek	not listed	Bacteria, Sediment, Nutrients	006_02

EPA understands that such waters would have been included on the state 303(d) list had the state been aware that these waters were impaired at the time the list was completed. The information contained in this TMDL demonstrates that these non-listed waters are in fact water quality limited segments in need of a TMDL. Because these waters now have approved TMDLs associated with them, they do not need to be added to the state 303(d) list.

The December 30, 2003, submittal also includes the Implementation Strategies for the TMDLs. The strategies were developed and submitted pursuant to the TMDL Settlement Agreement of July 2002. While EPA is not taking action on the Implementation Strategies, 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 to take actions that will implement reductions called for by this TMDL. 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.

I commend Clyde Lay for providing EPA a well researched and articulated document that clearly illustrated the effort that went into the TMDL. I also appreciate the additional work to incorporate the changes to reflect the current 'natural conditions' provisions that EPA requested. I look forward in assisting the state with developing approaches to further define this part of future temperature TMDLs planned in the Twin Falls regional office.

I would also like to extend my thanks to Clyde Lay and Mike Etchevery for providing Martha Turvey with a tour of the watershed to EPA, which helped in her understanding of the document and the goals and objectives of the implementation efforts that are ongoing in the watershed.

By EPA's approval, these TMDL's are now incorporated into the State Water Quality Management Plan under Section 303(e) of the Clean Water Act. If you have any questions or comments, please feel free to contact me at (206) 553-1261 or Martha Turvey at (206) 553-1354.

Sincerely,



*hw*  
Michael F. Gearheard  
Director  
Office of Water

cc: Marti Bridges, IDEQ TMDL Program Manager, IDEQ  
Clyde Lay, Twin Falls Regional Office, IDEQ  
Mike McIntyre, Twin Falls Regional Office, IDEQ  
Doug Howard, Regional Administrator, IDEQ  
Doug Conde, Idaho Attorney General, IDEQ  
Sonny Buhidar, Regional Water Quality Manager, IDEQ