



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
WHISKEYTOWN NATIONAL RECREATION AREA
WHISKEYTOWN-SHASTA-TRINITY NATIONAL RECREATION AREA
P.O. BOX 188
WHISKEYTOWN, CA 96095-0188



N3617

March 10, 2009

Danny McClure
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670

Dear Mr. McClure:

It has come to our attention during the Draft 2008 California 303(d)/305(b) Integrated Report process that Willow Creek below Greenhorn Mine (Shasta County) is under consideration for 303(d) listing for *Escherichia coli* (*E. coli*). The NPS at Whiskeytown National Recreation Area believes that this listing is unwarranted and in error. Environmental conditions and aspects of the listing process that have led us to this conclusion include:

- Willow Creek below the Greenhorn mine has few sources for human fecal contamination. To the best of our knowledge, only three residences exist within the basin, and only two are occupied year round. It seems unlikely that these few occupants could produce *E. coli* concentrations to the extent reported in the Supporting Information for this water body provided on your web-site.
- We understand that warm-blooded animals are a potential source of *E. coli*; however chronic contamination as reported in the Supporting Information for this water body seems unlikely, given the relatively remote and natural conditions of the watershed. Past studies at Whiskeytown National Recreation Area involving *E. coli* monitoring have shown that in natural settings concentrations of *E. coli* due to wildlife are detectable during the first rain storms after prolonged dry spells, but this condition is acute, and not chronic, and have not exceed Basin Plan water quality limits for *E. coli*. This study was performed near Willow Creek, in Clear Creek, just upstream of the confluence with Willow Creek (*Upper Clear Creek Water-Quality Sampling for Fecal Indicators, May 2005 through September 2006*, on-file at RWQCB, Redding, CA office)
- Accessing the SWAMP data entered by SWRCB into BDAT database (supported through a web-link) provides no reference or information concerning Willow Creek below



Greenhorn Mine for 303(d) listing of *E. coli*. This has been confirmed by local RWQCB staff in the Redding, CA office.

- Willow Creek (Lassen County) is newly listed for the 303(d) list as is Willow Creek below Greenhorn Mine (Shasta County). Supporting evidence for both listings seems very similar including station descriptions and sample size as provide in the on-line Supporting Information. We believe that possibly the Lassen County Willow Creek data was entered in error into the Shasta County Willow Creek database, or possibly from another Willow Creek in California.

Given what we know about Willow Creek below the Greenhorn Mine (Shasta County) including population density, wildlife and *E coli* concentrations in nearby watersheds, and aspects of the SWAMP database and 303(d) Supporting Information, we believe that the proposed listing for *E. coli* is not warranted and in error. If you disagree with our conclusion, please provide us with specific sampling information including dates, times, geographic coordinates, and other supporting information for this listing. If the RWQCB agrees with our conclusion, please provide us with written confirmation that Willow Creek below the Greenhorn Mine (Shasta County) will not be considered for 303(d) listing for *E. coli* in the 2008 California 303(d)/305(b) Integrated Report. Any questions, comments, or concerns can be addressed to our staff Geologist Brian Rasmussen. He can be reached at (530) 242-3444, or by e-mail at brian_rasmussen@nps.gov.

Sincerely,

/s/ Jim Milestone

Superintendent