

Once again the Arkansas Department of Environmental Quality (ADEQ) listed Fourche Creek as a Category 5 low priority impaired waterbody. However, in the 2018 303(d) list only Reach 24 is listed as impaired. This reach reflects the water quality of the upper Fourche Creek watershed to the confluence of Rock Creek and Fourche Creek. For the first time since the 2008 303(d) list, Reach 22, which includes the lower part of the Fourche Creek watershed, was not listed as impaired. Attachment 1 summarizes the findings of ADEQ 303(d) assessments since 2008. Based on the differences between various assessments over time, Fourche Creek water quality data should be reexamined and Fourche Creek potentially assigned a higher priority. The reasons for this request are the following:

1. Until the 2016 303(d) list, Reach 22, from the confluence of Rock Creek and Fourche Creek to the Arkansas River, has been listed as impaired for not meeting the designated use for aquatic life/fisheries. In the 2016 303(d) list, no designated uses were listed as impaired and the 2018 303(d) list Reach 22 was not listed as impaired. Why was Reach 22 delisted? As a member of the Fourche Creek steering committee, I am not aware of any restoration activities other than cleanups that would warrant removal.
2. In the 2008 303(d) list, Reach 24 and 22 were listed as impaired because the designated uses primary contact and aquatic life were not met. In addition, the priority ranking for aquatic life in Reach 22 was high (Category 5a). It is our understanding that a Category 5a in 2008 warranted a TMDL.
3. The source of contaminants has been identified as unknown and/or surface erosion. We believe that urban runoff should be listed as a source of contaminants. Much of the Fourche Creek watershed is in the City of Little Rock and the amount of trash in the Creek is astonishing. From 2014 to 2017, Arkansas Audubon has hosted two or more Fourche Creek cleanups per year (Attachment 2). Approximately 31.8 tons of trash have been removed as well as hundreds of tires. This number does not include cleanups conducted elsewhere in the watershed such as cleanups in Coleman Creek conducted by the University of Arkansas-Little Rock Aquatic Science Association.
4. Fourche Creek is a potential major recreation resource for Metropolitan Little Rock. The Arkansas Game and Fish has built a boat ramp at Benny Craig Park and section of the creek has been designated the Fourche Creek Urban Water Park. There is a concern for fecal contamination in the creek as major sewer lines pass through the area to wastewater treatment plants. Anecdotal information suggests that during major flood events the sewer main lids pop and there is raw sewage release directly to the creek. This is a concern for secondary contact (kayak and canoeing) recreation. In the 2008 303(d) list, primary contact recreations was designated as impair because of pathogenic indicator bacteria.
5. Although there was insufficient data to meet the 2018 Assessment Methodology for fecal coliforms, a review of data from October 11, 2005 to April 17, 2007 indicated four (4) exceedances out of 11 samples at ARK0147C for a total of 36% of the sample being out of compliance. The data per secondary contact season did not meet the criteria of eight samples per secondary season year to qualify. However, it does give some insight into potential impairment.

Because of the differences in the various assessments from 2008 to 2018 and the potential water resource for Central Arkansas, it is recommended that Fourche Creek's low priority be reexamined.

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Steering Committee Friends of Fourche Creek

Year	Reach	Miles	Monitoring Sites	Designated Use Not Met	Source	Cause	Category	Priority
2008	24	11.2	ARK0130 plus others*	Primary contact, Aquatic life, Drinking water	Unknown, Surface erosion	Dissolved oxygen, Pathogen indicator bacteria , Siltation / turbidity, Zinc, Copper, Beryllium	5a, 5d, 5f, 5g	Low
	22	9.2	ARK0131 plus others*	Aquatic life, Primary contact	Unknown, Surface erosion,	Turbidity/siltation, Pathogen indicator bacteria	5a, 5f, 5g	High for aquatic life and low for the others.
2010	24	11.2	ARK130 plus others*		Unknown, Surface erosion	Dissolved oxygen, Turbidity, Zinc		Low
	22	9.2	ARK131 plus others*	Aquatic life	Unknown, Surface erosion	Dissolved oxygen, Turbidity, Copper		Low
2012	24	11.2	ARK130 plus others*		Surface erosion	Turbidity		Low
	22	9.2	ARK131 plus others*	Fisheries	Unknown, Surface erosion	Turbidity, Copper		Low
2014	24	11.2	ARK130 plus others*		Unknown, Surface erosion	Turbidity, Copper		Low
	22	9.2	ARK131 plus others*	Fisheries	Unknown, Surface erosion	Temperature, turbidity, copper		Low
2016	24	11.2	ARK0130, ARK0159, ARK0147E, F, G, I		Unknown	Dissolved oxygen		Low
	22	9.2	ARK0131, ARK0147A, B, C, D		Unknown, Surface erosion	Dissolved oxygen, Temperature, Turbidity		Low
2018	24	22.1	ARK031, ARK0159, ARK0147E, F, ARK0147G, H		Unknown Surface erosion	Dissolved oxygen, Turbidity	5	Low

*Assume the other stations include ARK0147A through ARK0147H - Arkansas Audubon Sites

Date	Number of Bags of Litter / Trash Collected	Number of Bags of Recyclable Items Collected	Acres of parks/public lands/trails improved	Length of Trail Cleaned (Miles)	Waterways Cleaned (Miles)	Estimated Weight of Trash Removed (tons)	Comments	
10/28/2017	80			89	0.5	0.83	4.08	Trash cleanup was done in conjunction with a BioBlitz.
3/11/2017	130	To dirty to separate			0.5	0.5	4	Loaded 202 tires on to Davis Tire's trailer. This included 25 tires taken out during the event, 176 tires plus 1 tractor tire pulled out by the Arkansas Canoe Club prior to the event. Other bulky items were collected included traffic cones, plastic case, buckets, rusty metal parts, toy car, air conditioner, tarps
10/29/2016	106			46		0.3	2.2	Two illegal dumping sites cleaned, 82 tires removed. Other bulky items: ice chest full of trash, dumped bags of loose trash, wood, metal chunks, car parts, chair frame, carpet, weed eater, buckets, mattresses (2), basket, and pipe.
5/8/2016	30			4		0.4	0.6	
3/12/2016		2		75	0.5	0.4	8	Number of bags unknown; estimated 6 tons between three dumpsters, miscellaneous bags and bulky items picked up later. Tires (169) made up another two tons.
10/24/2015	91						1	14 tires
4/25/2015	178			17	0.8	1.3	1.8	30 tires were removed, 10 community groups were involved
3/14/2015	140			60		0.4	2.8	20 community groups were involved and \$1000 in-kind donations. 51 tires were removed.
		2.8 tons of plastics, aluminum, steel cans glass, electronics.						
1/20/2015	140	1.4 tons		60		0.4	5.29	removed 51 tires, 40 bags of shingles, 100 plus flower pots, TV, Vacuum cleaner, wood bench, bowling ball, mattress, playground part, handgun. Collected 3.93 tons of trash and 1.36 tons of recycleables.
9/27/2014	152					0.1	2	Also hoisted out were a tractor tire, a scooter, and a 17-foot ski boat
4/19/2014								25 yards of waste. Scott Hamilton Rd., trash site 1
Totals (Approximate)	1047	4.2	351	2.3	4.63	31.77		

Attachment 2. Summary of Fourche Creek Cleanups