

From: moodygd@everyactioncustom.com on behalf of [Gary Moody](#)
To: [WaterbodyComments](#)
Subject: 303(d) Comments
Date: Friday, September 7, 2018 9:17:00 AM

Dear Arkansas Department of Environmental Quality,

As the acting Executive Director for Audubon Arkansas and a concerned citizen, I care about the water quality of Fourche Creek. I am writing to express my concern about the way Fourche Creek is categorized in the 2018 303(d) list of impaired waterbodies. Fourche Creek is listed as impaired but is considered to be a Category 5 low priority. I believe that Fourche Creek water quality data should be reexamined and Fourche Creek potentially assigned a higher priority for the following reasons:

1. Until the 2016 303(d) list, Reach 22, from the confluence of Rock Creek and Fourche Creek to the Arkansas River, had 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. Unless there are data to support delisting, Reach 22 should be listed as impaired.
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). A Category 5a in 2008 warranted a TMDL. A TMDL should be set and aquatic life should still be listed as not supported.
3. The source of contaminants has been identified as unknown and/or surface erosion. Given the urban nature of the creek and the astonishing amount of trash in the creek, urban runoff clearly should be listed as a source of contaminants.
4. Primary and secondary contact uses should be listed as not being supported because of pathogenic indicator bacteria. During major floods sewer main lids in the floodplain pop so raw sewage is released directly into the creek. Data collected by the Friends of Fourche Creek in 2016 show that E. coli counts spike after storm events.

As the lead organization for Friends of Fourche Creek, clear Audubon cares about the water quality of Fourche Creek, and want to see it improved, but first ADEQ needs to conduct an accurate assessment for the 2018 303(d) list. Fourche Creek is a high priority to us and should be to ADEQ as well.

Audubon Staff is happy to consult with ADEQ on any specifics with Fourche Creek as we have more than a decade of hands on experience working in this particular watershed.

Sincerely,
Mr. Gary Moody
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