

From: [Suzanne Hirrel](#)
To: [WaterbodyComments](#)
Subject: Fourche Creek 303 d comment
Date: Tuesday, September 11, 2018 10:47:04 AM

The Arkansas Department of Environmental Quality has released the 2018 303(d) list of impaired waterbodies in Arkansas. Fourche Creek is once again listed as impaired but is considered to be a Category 5 low priority. This year 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. We believe that the 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? We are not aware of any activities 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, the Audubon Arkansas has hosted two or more Fourche Creek cleanups per year. Approximately 34 tons of trash have been removed by volunteers. In addition, hundreds of tires have been removed. Many more tons of trash and tires have been removed by the Arkansas Canoe Club.
4. There is a concern for fecal contamination in the creek as major sewer lines pass through the area to wastewater treatment plants. During major flood events the sewer main lids pop and there is raw sewage released directly into 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. Data collected by the Friends of Fourche Creek in 2016 show that *E. coli* counts spike after storm events.

Because of the differences in the various assessments from 2008 to 2018 we recommend that Fourche Creek low priority be reexamined. In addition, Fourche Creek is a high priority to the residents and visitors of Little Rock as a potential major recreational resource. The City of Little Rock and the Arkansas Game and Fish built a boat ramp at Benny Craig Park. The section of the creek that runs through Fourche Bottoms has been designated an Arkansas Urban Water Trail by the Arkansas Game and Fish Commission.

Suzanne Hirrel

Little Rock