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.

Forrest Payne PhD - Principal - Freshwater Solutions, LLC
Steering Committee Friends of Fourche Creek
<table>
<thead>
<tr>
<th>Year</th>
<th>Reach</th>
<th>Miles</th>
<th>Monitoring Sites</th>
<th>Designated Use Not Met</th>
<th>Source</th>
<th>Cause</th>
<th>Category</th>
<th>Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>24</td>
<td>11.2</td>
<td>ARK0130 plus others*</td>
<td>Primary contact, Aquatic life, Drinking water</td>
<td>Unknown, Surface erosion</td>
<td>Dissolved oxygen, Pathogen indicator bacteria, Siltation / turbidity, Zinc, Copper, Beryllium</td>
<td>5a, 5d, 5f, 5g</td>
<td>Low</td>
</tr>
<tr>
<td>2010</td>
<td>24</td>
<td>11.2</td>
<td>ARK130 plus others*</td>
<td>Aquatic life, Primary contact</td>
<td>Unknown, Surface erosion</td>
<td>Dissolved oxygen, Turbidity, Zinc</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td>24</td>
<td>11.2</td>
<td>ARK130 plus others*</td>
<td>Fisheries</td>
<td>Unknown, Surface erosion</td>
<td>Dissolved oxygen, Turbidity, Copper</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>24</td>
<td>11.2</td>
<td>ARK130, ARK0159, ARK0147E, F, G, I</td>
<td>Aquatic life</td>
<td>Unknown</td>
<td>Dissolved oxygen</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>24</td>
<td>22.1</td>
<td>ARK0121, ARK0147A, B, C, D</td>
<td>Fishery</td>
<td>Unknown, Surface erosion</td>
<td>Dissolved oxygen, Temperature, Turbidity</td>
<td>Low</td>
<td></td>
</tr>
</tbody>
</table>

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

Attachment 1  Summary of 303(d) list from 2008 to 2018
<table>
<thead>
<tr>
<th>Date</th>
<th>Number of Bags of Litter / Trash Collected</th>
<th>Number of Bags of Recyclable Items Collected</th>
<th>Acres of parks/public lands/trails improved</th>
<th>Length of Trail Cleaned (Miles)</th>
<th>Waterways Cleaned (Miles)</th>
<th>Estimated Weight of Trash Removed (tons)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/28/2017</td>
<td>80</td>
<td></td>
<td>89</td>
<td>0.5</td>
<td>0.83</td>
<td>4.08</td>
<td>Trash cleanup was done in conjunction with a BioBlitz. 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</td>
</tr>
<tr>
<td>3/11/2017</td>
<td>130</td>
<td>To dirty to separate</td>
<td></td>
<td>0.5</td>
<td>0.5</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>10/29/2016</td>
<td>106</td>
<td></td>
<td>46</td>
<td>0.3</td>
<td></td>
<td>2.2</td>
<td>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.</td>
</tr>
<tr>
<td>5/8/2016</td>
<td>30</td>
<td></td>
<td>4</td>
<td>0.4</td>
<td></td>
<td>0.6</td>
<td></td>
</tr>
<tr>
<td>3/12/2016</td>
<td>2</td>
<td></td>
<td>75</td>
<td>0.5</td>
<td>0.4</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>10/24/2015</td>
<td>91</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>14 tires</td>
<td></td>
</tr>
<tr>
<td>4/25/2015</td>
<td>178</td>
<td></td>
<td>17</td>
<td>0.8</td>
<td>1.3</td>
<td>1.8</td>
<td>30 tires were removed, 10 community groups were involved</td>
</tr>
<tr>
<td>3/14/2015</td>
<td>140</td>
<td></td>
<td>60</td>
<td>0.4</td>
<td></td>
<td>2.8</td>
<td>20 community groups were involved and $1000 in-kind donations. 51 tires were removed</td>
</tr>
<tr>
<td>1/20/2015</td>
<td>140</td>
<td>1.4 tons</td>
<td>60</td>
<td>0.4</td>
<td></td>
<td>5.29</td>
<td>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 recyclables.</td>
</tr>
<tr>
<td>9/27/2014</td>
<td>152</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>Also hoisted out were a tractor tire, a scooter, and a 17-foot ski boat</td>
</tr>
<tr>
<td>4/19/2014</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>25 yards of waste. Scott Hamilton Rd., trash site 1</td>
</tr>
<tr>
<td>Totals</td>
<td>(Approximate)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Attachment 2. Summary of Fourche Creek Cleanups</td>
</tr>
</tbody>
</table>