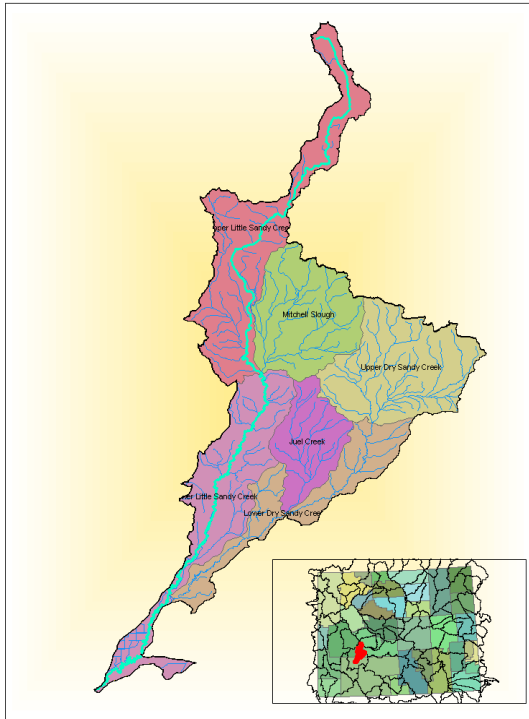


# Little Sandy Watershed Plan



A comprehensive natural resource management plan  
designed to address water quality issues  
in the Little Sandy Watershed

Developed by:  
Sublette County Conservation District  
and  
Little Sandy Watershed Steering Committee  
Assistance Provided by:  
USDA Natural Resources Conservation Service  
Wyoming Association of Conservation Districts

**Little Sandy Watershed Water Quality Management Plan**  
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35		
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1 **Introduction**

2 ***1.A. Steering Committee***

- 3 • Little Sandy Grazing Association (LSGA)
- 4 • Wyoming Game and Fish Department (WGFD)
- 5 • Rock Springs Bureau of Land Management (BLM)
- 6 • Natural Resources Conservation Service (NRCS)
- 7 • Wyoming Office of State Lands and Investments (OSLI)
- 8 • Wyoming Department of Environmental Quality (WDEQ)
- 9 • Wyoming Association of Conservation Districts (WACD)
- 10 • Sublette County Conservation District (SCCD)

11

12 ***1.B. Mission***

13 **The mission of the Little Sandy Watershed Steering Committee is to support**  
14 **voluntary land use and other practices within the land area, identify natural**  
15 **conditions, and address human influenced water quality issues related to non-**  
16 **point source pollution within the Little Sandy watershed. The history, custom,**  
17 **culture, and natural background influences within the watershed will be**  
18 **considered. The watershed plan will be developed to identify natural resource**  
19 **issues, and if needed, practices which will alleviate the need for regulatory**  
20 **agency enforcement actions.**

21

22 ***1.C. Purpose***

23 The purpose of the Little Sandy Watershed Plan is to:

- 24 • Define the possible causes and extent of the impairment on the Little Sandy, and an estimate  
25 of natural background loads and anthropogenic inputs and sources of sediment, for effective  
26 implementation of practices to address the impairment that are applicable to water quality  
27 standards.
- 28 • Estimate load reductions for significant sources needed to meet reduction targets and the  
29 Best Management Practices (BMPs) to address them.
- 30 • Estimate the total amount of Technical and Financial Assistance and other associated costs  
31 and the possible sources that will be relied on for implementation.
- 32 • Develop information and education to enhance the public understanding of the watershed  
33 and the BMP selection, design, and implementation process.
- 34 • Create an implementation schedule for planned BMPs.
- 35 • Establish Interim goals and milestones.
- 36 • Evaluate progress through development of criteria to establish changes in loading over time  
37 to determine if planning and implementation needs revision. Maintain a monitoring  
38 component to measure the effects of implementation against the criteria established for  
39 evaluating progress and milestones of the plan.

40

41

1 **1.D. Clean Water Act**

2 The Clean Water Act (CWA) was adopted by Congress for two primary purposes. That is to:

- 3 ● Restore and maintain the chemical, physical, and biological integrity of the nation’s waters;
- 4 and
- 5 ● Where attainable, to achieve water quality that promotes protection and propagation of fish,
- 6 shellfish, and wildlife, and provide for recreation in and on the water. This goal is
- 7 commonly expressed by the phrase “fishable/swimmable”.

8  
9 **1.E. WDEQ Water Quality Standards**

10 In order to ensure compliance with the CWA, the State of Wyoming is required to adopt water  
11 quality standards (laws or regulations) to enhance water quality and protect public health and  
12 welfare. Under Section 305(b) of the CWA, the State of Wyoming must also report on the  
13 condition of their water(s) to the U.S. Environmental Protection Agency (EPA) once every two  
14 years. This report, prepared by the Wyoming Department of Environmental Quality (WDEQ), is  
15 known as the 305(b) report. Under section 303(d) of the CWA, States must identify those waters  
16 within its boundaries that are not meeting the water quality standards (“impaired waters”) applicable  
17 to that waterbody based on its designated use(s). A designated use is that use that a waterbody is  
18 capable of attaining although it may or may not be currently attained by that specific segment or  
19 body of water. States are required to address impaired waterbodies by establishing water quality  
20 standards and pollution control activities designed to achieve and maintain the designated uses.

21  
22 **1.F. WDEQ 303(d) List of Waters Requiring TMDLs**

23 The Little Sandy River was placed on Wyoming’s 1996 303(d) List as partially-supporting its aquatic  
24 life other than fish and cold water fisheries uses along a 26.9 mile segment below Elkhorn Junction.  
25 Causes of the impairment were identified as siltation, chloride, salinity and TDS and the sources of  
26 these pollutants were listed as livestock grazing and natural sources. The Little Sandy River was  
27 subsequently removed from the 1998 303(d) List because it was determined that quantitative or  
28 “credible data” were lacking to justify the listing. Subsequent monitoring by WDEQ on the Little  
29 Sandy River between 1998 and 2003 indicated that chloride, salinity and Total Dissolved Solids  
30 (TDS) were not a concern above Elkhorn Junction; however, areas of habitat degradation, stream  
31 bank instability and sedimentation were identified along several miles of Bureau of Land  
32 Management (BLM) lands, as well as, State and private lands below Elkhorn Junction. The BLM and  
33 grazing permit holders were already in the process of modifying the grazing management plan along  
34 the Little Sandy River within the Little Sandy Grazing Allotment to improve riparian and in-stream  
35 habitats; these changes included the installation of fencing and the rotation of stock within the  
36 allotment (BLM-GR, 2002). In 2004, WDEQ met with a stakeholder group including Sublette  
37 County Conservation District (SCCD), Sweetwater County Conservation District (SWCD), Bureau  
38 of Land Management (BLM) and the Little Sandy Grazing Association (LSGA) to discuss the  
39 study’s findings and to conduct a watershed tour. In an effort to evaluate the effectiveness of BMPs  
40 on reducing sedimentation within the impacted reach, identify potential sources of sediment and  
41 determine designated use support, WDEQ committed to monitoring the reach of concern for a  
42 period of five years (2004-2008). The resulting study (WDEQ, 2012) found that a section of the  
43 Little Sandy River from the northern boundary of Section 33-Township 28 North-Range 104 West-  
44 downstream 17.7 miles to the Sublette/Sweetwater County line was not supporting its aquatic life  
45 other than fish and cold water fisheries uses, and this segment was added to the 2012 303(d) List.  
46 Accelerated bank erosion is the primary source of the excess sediment and the causes have been  
47 identified as livestock and wildlife grazing and historic habitat/channel modifications.

1 ***1.G. Wyoming Conservation District Authority for Watershed Planning***

2 Following the enactment of the Clean Water Act (CWA), the U.S. EPA has delegated water quality  
3 assessment and regulatory responsibilities to the Wyoming Department of Environmental Quality  
4 (WDEQ) which is the regulatory agency responsible for enforcement of the CWA as it applies to  
5 Wyoming waters. Local Conservation Districts, by statutory authority, have assumed the  
6 responsibility of leading information and education programs and providing technical and financial  
7 assistance to their constituents to conserve Wyoming’s natural resources, and to protect the quality  
8 of life of all Wyoming citizens. Conservation Districts serve as a liaison between WDEQ and local  
9 land managers within the Little Sandy Watershed to address water quality concerns and to investigate  
10 historical, custom, cultural, and background conditions as they apply to environmental compliance  
11 with regard to water quality standards. The SCCD has endorsed the formation of the Little Sandy  
12 Watershed Plan Steering Committee to develop a locally-led, comprehensive watershed management  
13 plan to improve water quality while preserving the economic sustainability of activities and  
14 maintaining multiple uses within the Little Sandy Watershed.

15  
16 Under Wyoming Statute, 11-16-103 Legislative declarations and policy, the conservation districts  
17 have the authority to “provide for the conservation of the soil and water resources of this state, and  
18 for the control and prevention of soil erosion and for flood prevention or the conservation,  
19 development, utilization, and disposal of water, and thereby to stabilize ranching and farming  
20 operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of  
21 dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health,  
22 safety and general welfare of the people of this state.”

23  
24 Wyoming Statute 11-16-122 (b) authorizes the Conservation Districts to “conduct surveys,  
25 investigations and research and disseminate information relating to . . . the conservation,  
26 development, utilization and disposal of water. . . in cooperation with the government of this state  
27 or its agencies . . . (v),” to “develop comprehensive plans for . . . conservation of soil and water  
28 resources . . . [that] specify in detail the acts, procedures, performances, and avoidances necessary or  
29 desirable to carry out the plans (xvi),” and to “make public the plans and information and bring  
30 them to the attention of owners and occupiers of land within the district (xvii).”

31  
32 In 1996 Wyoming Conservation Districts, the Natural Resources Conservation Service and the  
33 Wyoming Department of Agriculture saw an increasing need for Conservation Districts to represent  
34 local interests and take the lead in watershed planning efforts. As a result they developed the  
35 Watershed Strategic Plan to guide watershed planning efforts across the state. This document insists  
36 that “any Watershed effort led by a conservation District should be landowner driven. . . [and] any  
37 participation on behalf of any landowner is strictly voluntary.” By taking an active role in the  
38 planning process, the Little Sandy Watershed landowners and the local Conservation District have  
39 adhered to this principle. The landowners have followed the steps for watershed planning as  
40 outlined in the Watershed Strategic Plan. They have identified and prioritized concerns, set goals  
41 and objectives, and developed a watershed management plan. Included in the Little Sandy  
42 Watershed Plan are elements to solicit funds, implement the plan, and evaluate the plan.

43 *Public Participation*

44 Following the release of data and findings by the Wyoming Department of Environmental Quality  
45 that indicated the need for action on the Little Sandy, the local land owners, in cooperation with the  
46 Sublette County Conservation District and in consultation with the Wyoming Association of

1 Conservation Districts held a series of public meetings in Farson, Wyoming to discuss options for  
2 addressing the concerns on the Little Sandy. These informational meetings, open to all created an  
3 opportunity for discussion among the different interested parties and the responsible local  
4 governments and agencies. The local stakeholders determined that it was in the best interest of the  
5 resource to begin developing a watershed level plan to maintain the progress that had been noted by  
6 WDEQ and to continue pursuing a path that would lead to a finding that the stream was meeting all  
7 of its designated uses.

8  
9 The Sublette County Conservation District supported the development of an ad hoc steering  
10 committee, the Little Sandy watershed steering committee, in the summer of 2011. That steering  
11 committee, composed of local landowners, local resource professionals and other interested parties  
12 began working on a monthly basis to develop the Little Sandy Watershed plan EPA watershed based  
13 planning criteria for section 319 funding were used as the map for determining the items addressed  
14 in the plan. Significant assistance in facilitation and plan development was provided by the USDA  
15 NRCS, WACD, and WDEQ.

## 16 **2. Watershed Description**

### 17 18 ***2.A. Hydrology***

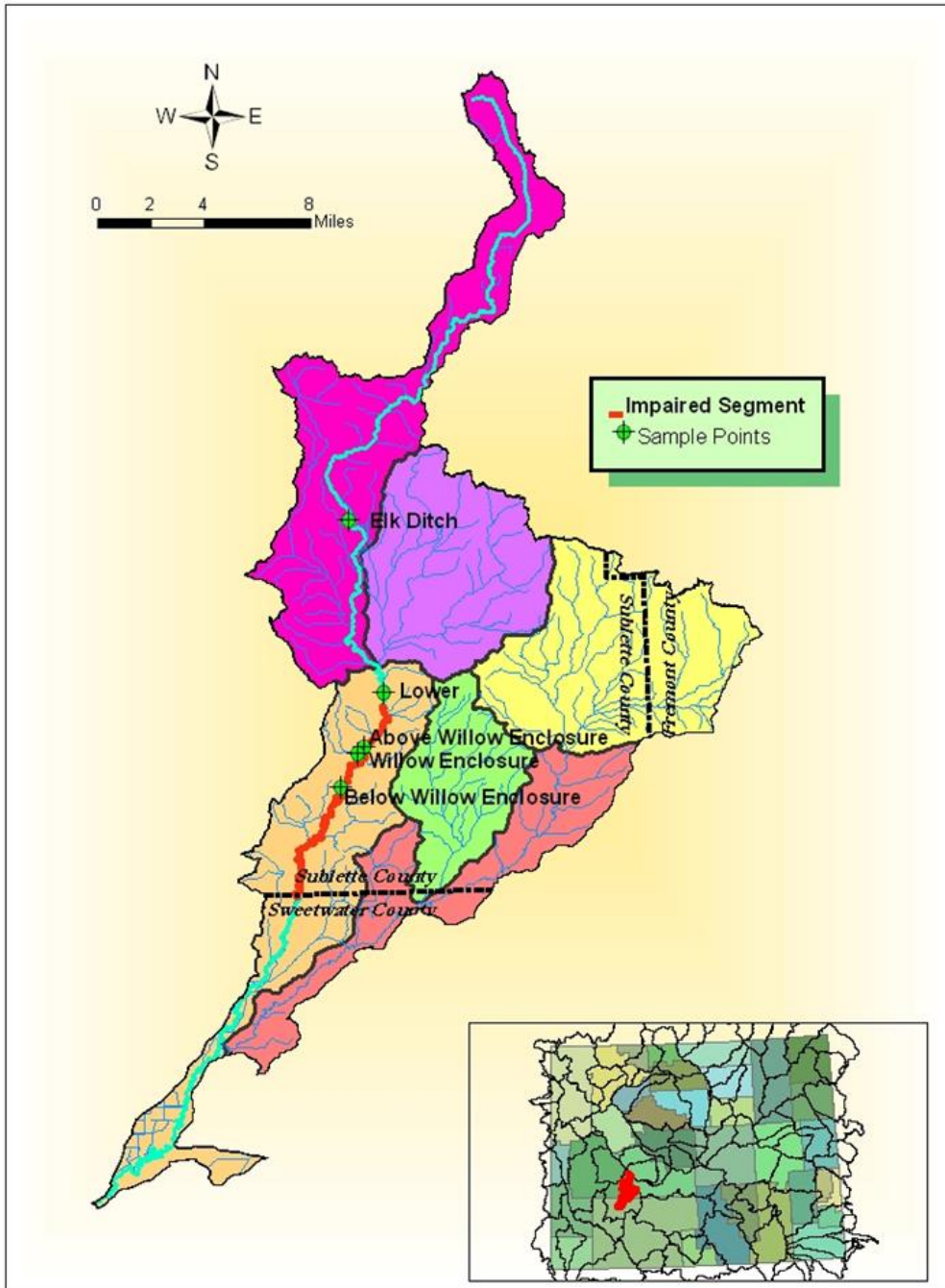
19 The Little Sandy River is a perennial stream that originates in the southern Wind River Mountains in  
20 Sublette County and flows south/southwest to its confluence with the Big Sandy River near Farson,  
21 Wyoming (Figure 1). The stream courses through a mixture of land ownership, predominantly  
22 managed by the United States Bureau of Land Management. The Wyoming Department of  
23 Environmental Quality Water Quality Division categorizes the Little Sandy River as a Class 2AB  
24 water throughout its entire length. Class 2AB waters are protected for the following designated uses:  
25 cold-water fisheries, non-game fisheries, drinking water, fish consumption, aquatic life other than  
26 fish, recreation, wildlife, industry, agriculture and scenic value (Wyoming Department of  
27 Environmental Quality, 2013).

28  
29 The Headwaters are located within the [Bridger Wilderness](#) in the Wind River Mountains, from here  
30 the stream moves through glacially carved landscapes until it drops into the prairie. Within the  
31 prairie, the stream cuts through soft Cretaceous and Tertiary sedimentary rocks until it joins the Big  
32 Sandy River, the Green River, the Colorado River, and ultimately drains into the Pacific Ocean.

33  
34 Most streams in the Little Sandy River watershed are ephemeral or intermittent and typically  
35 respond to snowmelt/spring thaw and intense thunderstorm events. The Little Sandy River is  
36 perennial and fed by snowmelt and springs. Stream flow in the Little Sandy River, from  
37 approximately the Sublette/Sweetwater County line (the location of the Chambers Ditch Diversion  
38 Dam) downstream to its confluence is greatly influenced by surface water diversions and operation  
39 of Eden Reservoir. Though a few surface water diversions occur upstream of Chambers Ditch  
40 Diversion Dam, their influence on the natural surface water hydrology of the Little Sandy River is  
41 minimal relative to diversions in the lower watershed.

42  
43 No active United States Geological Survey (USGS) gages occur on the Little Sandy River. However  
44 the USGS Little Sandy Creek Above Eden Gage (09214500)  
45 [http://waterdata.usgs.gov/nwis/nwisman/?site\\_no=09214500](http://waterdata.usgs.gov/nwis/nwisman/?site_no=09214500)) and the Little Sandy Creek Near  
46 Elkhorn Gage ( 09214000) [http://waterdata.usgs.gov/nwis/nwisman/?site\\_no=09214000](http://waterdata.usgs.gov/nwis/nwisman/?site_no=09214000)) are

1 both historic within the watershed. The Wyoming SEO maintains a gaging station at the District  
2 surface water site, downstream of Elkhorn Crossing and private land.



3  
4 Figure 1 – Location of the impaired segment of the Little Sandy, Watershed Boundaries, Tributaries, and Initial Sample  
5 Sites.  
6  
7  
8  
9  
10



1 **2.B. Soils**

2 The soils within the Little Sandy watershed have been mapped by the Natural Resource  
3 Conservation Service. Most of the soil mapping is at an approved for public use status, including  
4 the impaired segment in its entirety. The provisional mapping has also been provided further  
5 upstream for public use by the Pinedale Soil Survey Office. The soil types are important within the  
6 watershed for estimating rates of erosion.

7 Figure 2– Soils map showing soil types in the impaired segment.

8  
9 The riparian corridor is primarily Soil map unit 9114, the Harshinger Occasionally Flooded and  
10 Harshinger Rarely Flooded Complex. The Harshinger series consists of very deep, somewhat poorly  
11 drained soils that formed in recent alluvium. These soils are on stream terraces, drainageways, and  
12 floodplain steps. Harshinger is a coarse-loamy over sandy or sandy-skeletal, mixed, superactive,  
13 calcareous, frigid Oxyaquic Torrifluent. The slopes range from 0 to 2 percent. This complex is  
14 mapped on drainageways in intermontane basins. The parent material consists of alluvium derived  
15 from sedimentary rock. Depth to a strongly contrasting textural stratification is 20 to 39 inches.  
16 Somewhat poorly drained soil water movement in the most restrictive layers is high. Available water  
17 to a depth of 60 inches is low. These soils are occasionally flooded, however, no ponding occurs. A  
18 seasonal zone of water saturation is at 22 inches during April, May, June, July, August, September,  
19 October and November. The components are in the R034AY174WY Subirrigated (Green River –  
20 Great Divide Basins) ecological site and the R034AY130WY Overflow (Green River – Great Divide  
21 Basins) ecological site. The soil has a slightly sodic horizon within 30 inches of the soil surface.

22  
23 The upland areas along the riparian are varied, but are dominated by a few major soil types and map  
24 units. Map unit 5332, the Juel-Sandbranch-Ravenhole complex is common. Juel makes up 50  
25 percent of the map unit, Sandbranch makes up 25 percent of the map unit, and the Ravenhole  
26 makes up 15 percent of the map unit. Slopes are 1 to 8 percent. The parent material consists of  
27 slope alluvium over residuum weathered from sandstone and shale. Depth to a root restrictive layer,  
28 bedrock, paralithic, is 39 to 59 inches. The natural drainage class is well drained. The components  
29 are in the R034AY144WY Saline Upland (Green River - Great Divide Basins) ecological site,  
30 R034AY104WY Clayey (Green River - Great Divide Basins) ecological site, and the R034AY150WY  
31 Sandy (Green River - Great Divide Basins) ecological sites respectively. These soils do not meet  
32 hydric criteria. The soils have slightly saline horizon within 30 inches of the soil surface and a slightly  
33 sodic horizon within 30 inches of the soil surface.

34  
35 Map Unit 5333, the Ravenhole-Jonah-Buckloaf complex, is also common. The Ravenhole  
36 component makes up 35 percent of the map unit, the Jonah component makes up 35 percent of the  
37 map unit, and the Buckloaf component makes up 20 percent of the map unit. Slopes are 1 to 6  
38 percent. The parent material consists of eolian deposits over residuum weathered from sandstone  
39 and shale and slope alluvium over residuum weathered from sandstone and shale. Depth to a root  
40 restrictive layer, bedrock, paralithic, ranges from 20 to 59 inches. The components are in the  
41 R034AY150WY Sandy (Green River - Great Divide Basins) ecological site and the R034AY122WY  
42 Loamy (Green River - Great Divide Basins) ecological site. These soils have a slight to moderate  
43 sodic horizon within 30 inches of the soil surface.

44  
45 The final map unit shown here as a critical example, is the Forelle-Bluerim-Worfman complex, unit  
46 5504. It is steeper than some of the other examples, with slopes ranging from 2 to 35 percent. The  
47 Forelle component makes up 40 percent of the map unit, the Bluerim component makes up 25  
48 percent of the map unit, and the Worfman component makes up 15 percent of the map unit. These

1 components are on hillslope landforms residing on footslopes, shoulders, and backslopes  
2 respectively. The parent material consists of slope alluvium derived from sandstone and shale.  
3 Depth to a root restrictive layer varies from deep, greater than 60 inches, to shallow, 12 inches,  
4 depending on which soil is encountered and the location on the landform. The components are in  
5 the R034AY122WY Loamy (Green River - Great Divide Basins) ecological site, R034AY104WY  
6 Clayey (Green River - Great Divide Basins) ecological site, and the R034AY162WY Shallow Loamy  
7 (Green River - Great Divide Basins) ecological site. These soils have a slightly sodic horizon within  
8 30 inches of the soil surface.

### 9 10 **2.C. Vegetation**

11 As you move from higher to lower elevations in the watershed, the landcover changes significantly.  
12 Rocky mountain subalpine dry-mesic spruce fir forest is the first major landcover type encountered.  
13 As the elevation in the forest decreases, the major landcover is Rocky Mountain lodgepole pine  
14 forest. Once out of the pine forest, alluvial fans and transitions are encountered and covered with  
15 Inter-mountain basins montane sagebrush steppe, then inter-mountain basins big sagebrush steppe.  
16 Wyoming Dwarf Sage Brush Shrubland and inter-mountain basin big sagebrush shrubland make up  
17 the majority of the landcover in the lower sections of the watershed (2010, Gap)

18 The riparian corridor is best represented by the Subirrigated (Sb) 7-9" Green River Great Divide  
19 Basins Ecological Site Description (R034A174WY). The interpretive plant community for this site  
20 is the Historic Climax Plant Community and has evolved with grazing by large herbivores and is  
21 suited for grazing by domestic livestock. Potential vegetation is estimated at 70% grasses or grass-  
22 like plants, 15% forbs and 15% woody plants.

23  
24 The major grasses and grass-like plants include basin wildrye, tufted hairgrass, Nebraska sedge,  
25 inland sedge, slender wheatgrass and rhizomatous wheatgrasses. Other grasses and grass-like species  
26 that may occur on this site include Baltic rush, Canby bluegrass, Mat muhly, Northern reedgrass, and  
27 American and Tall mannagrass. Woody plants are mainly willows and Shrubby cinquefoil, but may  
28 also include Chokecherry, Wild rose, and Rubber rabbitbrush.

29  
30 A typical plant composition for this state consists of Basin wildrye 15-35%, Tufted hairgrass 15-  
31 30%, Nebraska sedge 5-10%, Inland sedge 1-10%, Slender wheatgrass 1-10%, Rhizomatous  
32 wheatgrass 1-10%, other grasses and grass-like plants 10-20%, perennial forbs 5-15%, willows 5-  
33 10%, Shrubby cinquefoil 5-10%, and 5-10% other woody plants. Ground cover, by ocular estimate,  
34 varies from 85-100%.

35  
36 The total annual production (air-dry weight) of this state is about 3000 pounds per acre, but it can  
37 range from about 2300 lbs./acre in unfavorable years to about 3500 lbs./acre in above average years.

### 38 39 **2.D. Climate & Topography**

40 The average annual precipitation for the Little Sandy watershed is 13 inches, with an 8 inch  
41 minimum and 30 Maximum (SuiteWater, 2017).

42  
43 The impaired reach of the Little Sandy received an average annual precipitation of 9 inches with a  
44 minimum of 7 inches and maximum of 11 inches.

45  
46 The Natural Resources Conservation Service has maintained monitoring for snowfall and other  
47 weather data within the general area. Specific data can be found on the Big Sandy Snotel Site

1 <https://wcc.sc.egov.usda.gov/nwcc/site?sitenum=342> with details on the amount and timing of  
2 precipitation in the Wind River Mountains near the watershed headwaters.

3  
4 Climate data has been collected near the watershed as part of the standard practices of other entities.  
5 The nearest data that can be correlated to is that of Farson, Wyoming.  
6 <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?wy3170>. The United States Geological Survey has  
7 maintained stream flow gages at several points within the watershed over time, as mentioned on  
8 page 8.

9  
10 The range of elevation in the watershed is from 12,808 feet in the mountains, to 6,552 feet at the  
11 outlet of the watershed. The mean elevation is 7,376.59 feet.

### 12 Wyoming Water Development Cloud Seeding Project

13  
14 The Wyoming Water Development Commission has worked on the development of a cloud seeding  
15 program within the Wind River Mountain Range, and a large part of that program affects the  
16 watershed. The steering committee will stay informed on any development of Cloud Seeding  
17 efforts that could affect hydrology within the watershed.

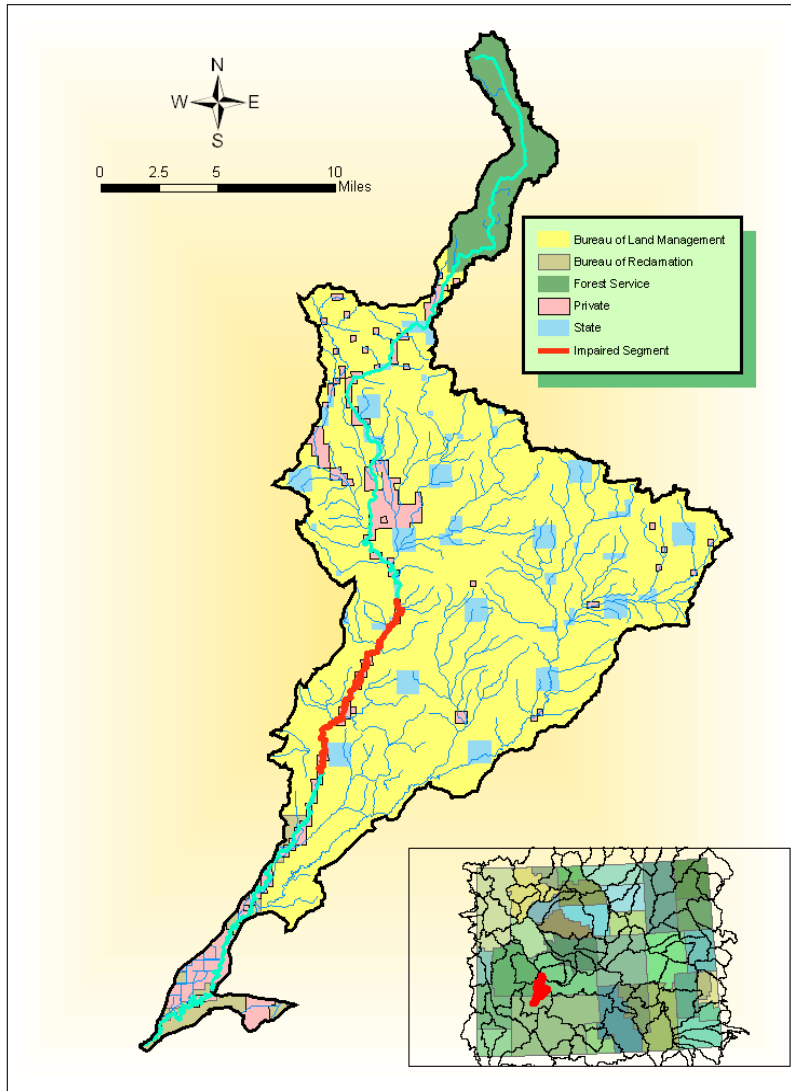
## 18 **2.E. Land Management and Land Use**

19  
20 The Little Sandy Watershed has a 10 digit Hydrologic Unit Code (1404010404), with sub-watersheds  
21 located therein: Juel Creek, Lower Dry Sandy Creek, Lower Little Sandy Creek, Mitchell Slough,  
22 Upper Dry Sandy Creek, Upper Little Sandy Creek. The watershed itself is a sub-watershed of the  
23 larger Big Sandy watershed, lying primarily within Sublette County, Wyoming. The Little Sandy  
24 watershed has a total of 181,941 acres. Land management in the watershed is mixed as shown in  
25 Figure 3. The United State Bureau of Land Management is responsible for 77.81 percent of the  
26 surface, private land owners 7.12 percent, the State of Wyoming 6.65 percent, United States Forest  
27 Service 6.38 percent, and the United States Bureau of Reclamation 2.01 percent. The State of  
28 Wyoming managed lands are used primarily for grazing. Though most of the state lands in the  
29 watershed are in the “uplands”, some of the area managed by the state lies along the riparian  
30 corridor, with a small portion falling directly within the impaired segment.

### 31 Administration and Political Boundaries

32  
33 The watershed is managed under a series of governmental units that are important to the functions  
34 of water quality, quantity and distribution of water: Within the watershed the following units of  
35 management and government exists:

- 36 • The State Engineers office District 6 Division 4
- 37 • Wyoming Office of State Lands and Investments
- 38 • Eden Valley Irrigation District
- 39 • Wyoming High Dessert BLM District
- 40 • BLM Rock Springs Field Office
- 41 • Sublette County Conservation District
- 42 • Sweetwater County Conservation District
- 43 • Bridger-Teton National Forest Pinedale Ranger District
- 44 • Wyoming Game and Fish



1 Figure 3 – Land management within the Little Sandy Watershed

2

3 *Anthropomorphic Influence*

4 Based on estimates from the 2010 census, the population within the watershed is around 140

5 individuals.

6

7 There are 3,368 irrigated acres within the watershed, primarily in the lower Little Sandy.

8

9 Agricultural statistics are unavailable for the watershed itself, but they are available for the county.

10 Based on the 2012 Ag Census by the United States Department of Agriculture National Agricultural

11 Statistics Service (NASS) within Sublette County, agriculture is a significantly important industry in

12 the county, and within the watershed (NASS, 2012). The number of agricultural operations has

13 increased within the county by 9%. The current private grazing land Animal Unit Month (AUM)

14 value is \$21.00 based on 2016 Wyoming Ag Stats Bulletin.

15

16 Most private agricultural land within the county is dedicated to hay production, with roughly 77% of

17 agricultural lands being used as such. Cropland made up almost 20% of the remaining agricultural

1 uses. The lower portion of the watershed, below the impairment, is within the Eden valley Irrigation  
2 District. The primary agricultural product produced within the county in terms of units is forage,  
3 with over 93,000 tons produced in 2015 (SuiteWater, 2017). 4,500 tons of that was alfalfa hay, with  
4 the remainder being forage; much of which is harvested and utilized on site for livestock. Livestock  
5 within the county in 2012 was comprised of primarily cattle, roughly 69,588 including calves (NASS,  
6 2012). Sheep were not accounted for in the 2012 census, however about 11,500 sheep including  
7 lambs were recorded in the 2009 census (NASS, 2009). There are roughly 3,376 horses in the  
8 county, and 629 layers (NASS, 2012). The vast majority of the livestock producers are cow/calf and  
9 lambing operations who grow and ship livestock to other areas. These numbers, although not  
10 specific to the watershed alone, illustrate the general agricultural operations in the area.  
11

### 12 Watershed Land Use History

13 As with many areas of the arid west, historic land use in the watershed is tied to production  
14 agriculture in general and livestock production in particular. Prior to the late 1960's, the vast  
15 majority of livestock grazing within the Little Sandy watershed was centered on the sheep industry.  
16 A few cattle from the Boulder area were permitted on the upper stretches below the forest boundary  
17 in conjunction with the sheep use. In addition, Bar X Sheep Company also ran some cattle on their  
18 portion of the watershed starting in the early 1960's. The area of the Little Sandy watershed under  
19 USFS management was permitted to the White Acorn Sheep Company, who ran sheep there until  
20 the early 1970's. Grazing within the forest occurred primarily in the summer, between July 10 and  
21 September 10 each year.  
22

23 The Bar X Sheep Company (Leonard Hay) acquired the majority of the Little Sandy from the forest  
24 boundary past the Megeath Place just upstream 2 ½ miles from the impaired segment, at an early  
25 date, somewhere in the late 1930's or early 1940's. The two exceptions were in an area adjacent to  
26 Prospect Mountain, still held by Midland Land & Livestock (Pete Arambel), and an area of state land  
27 just below Elkhorn, held by Blair & Hay (John Hay) that has been fenced in recent years. Bar X  
28 held one permit on the Forest in the upper Little Sandy drainage. The majority of Bar X use was for  
29 lambing their late lambing ewes. Historically, sheep would be brought in around May 25th for range  
30 lambing and remain lower on the watershed until going to the Forest in early July. Some areas of  
31 fenced pasture on the river served as a ram pasture throughout the summer and early fall. Fall use  
32 with herds in the watershed was minimal.  
33

34 Blair and Hay held rights to state land sections in the watershed and used those lands primarily as a  
35 resting place while trailing herds to and from the Pacific Creek Allotment to the Forest. At the  
36 point where the Sublette County Road (from Boulder to the Sweetwater County line) crosses the  
37 Little Sandy River, several herds of sheep trailed across each summer going to and from the Forest  
38 at the Big Sandy Opening.  
39

40 A tributary of the Little Sandy called Mitchell Slough (with the exception of its last mile used by  
41 Leonard Hay) was used by another sheep operation, Lander Creek Land & Livestock (Paul Juel)  
42 until it was acquired by Magagna Bros. in 1952. Mitchell Slough is primarily an ephemeral drainage  
43 that is supplemented in part by a water right from Magagna Bros. out of the Little Sandy. In the  
44 1968 BLM adjudication it was proposed to put this area into the Little Sandy Allotment. However,  
45 by agreement of all parties it was left within the Little Prospect Allotment and the Little Sandy  
46 Grazing Association was permitted use in the allotment. Sheep use on this drainage still occurs  
47 from May 15th to July 10th.  
48

1 The portion of Little Sandy from the Megeath place to the Eden Project was a part of the Spicer  
2 sheep operation until 1965. It was used as a lambing area from approximately May 5th until sheep  
3 began trailing to the forest in early July. Again, the only regular summer use on the Little Sandy  
4 would have been for rams. Spicer again used this area in the fall, approximately September 10 to  
5 October 30 (Jim Magagna, 2011). Ownership and management of the land changed significantly in  
6 1965. Producers began converting sheep permits to cattle permits and the Little Sandy Grazing  
7 Association purchased private land and grazing rights from Leonard Hay and the Spicer's. The  
8 Association then improved the newly acquired grazing land by installing boundary fences and nine  
9 off-stream water sources.

10  
11 In the mid-seventies grazing permits in the area were adjudicated and allotments were assigned.  
12 Little Sandy Grazing permits were divided between the Little Sandy and the Little Prospect  
13 allotments. Some boundary fences divided the allotments. The Little Prospect Allotment is in  
14 common use with sheep. Grazing plans were written for both allotments. They were both deferred  
15 systems utilizing private, state, and federal lands. Cross fences were built to aid in pasture  
16 management.

17  
18 In 1990, the Little Sandy Grazing Association, White Acorn Ranch and Magagna Brothers were  
19 recognized for their leadership in riparian management by the BLM. Their accomplishments were  
20 used in a BLM training video utilized at the agencies National Training Center in Phoenix, Arizona.

21  
22 Some of the more recent activities within the watershed have included adjustments in grazing  
23 management to further improve riparian habitat. A deferred grazing system was put in place in the  
24 Little Sandy allotment in which cattle grazed one side of Little Sandy River in the spring and the  
25 alternate side in the fall. The following year this procedure was reversed. Under this grazing system  
26 cattle have access to the riparian area both spring and fall. Thus, in order to help control grazing on  
27 the riparian area, seven miles of riparian management fence was built in 2003.

28  
29 In addition to the Little Sandy Grazing Association, other current permittees in the Little Sandy  
30 allotment are: Blair and Hay, Ruth Chesnovar, G&E Livestock, Midland Dunton Sheep Company,  
31 Magagna Brothers, and White Acorn Sheep Company. In 2002 Blair and Hay, Magagna Bros.,  
32 Midland Dunton, White Acorn, and G&E Livestock all took non-use. In the Little Prospect grazing  
33 allotment, in addition to the Little Sandy Grazing Association, are: Blair and Hay, G&E Land and  
34 Livestock, Magagna Brothers, Mark And Jeanna Renae Jones, and Hellyer Limited Partnership.  
35 Non-use in 2002 and 2003 was taken by Hellyers, G&E, and Blair and Hay.

### 36 Range Resources

37  
38 The major use of the Little Sandy Watershed at this time is related to range utilization by wildlife and  
39 livestock. The United States Forest Service (USFS), Blucher Creek Allotment sits at the top of the  
40 watershed. From the forest boundary, the area is dominated by public land allotments managed by  
41 the BLM. The BLM Rock Springs Field office is responsible for managing the allotments.

42  
43 As one follows the Little Sandy watershed and decreases in elevation, the following BLM grazing  
44 allotments are encountered:

45 The Prospect Mountain grazing allotment, 13004, sits higher in the watershed. There are multiple  
46 permit holders in the allotment, and 3,642 Animal Unit Months (AUM) are made available for  
47 livestock grazing on 48,738 acres, 8,094 acres (17%) lies within the Little Sandy watershed.

48 FLPMA [Sec. 4100.0-5] defines an AUM as "the amount of forage necessary for the sustenance of

1 one cow or its equivalent for a period of 1 month.” The allotment is broken in pastures identified as  
 2 A, B, C, D, E, and F.

3  
 4 The Little Prospect, 13002, grazing allotment is the next encountered in the watershed, and it also  
 5 has multiple users. The BLM has allocated 7,236 AUMs within this allotment on 84,346 acres for  
 6 the use of livestock grazing, of which 69,669 acres (83%) lies within the Little Sandy watershed. The  
 7 allotment is broken into the Lander Creek, Middle and South pastures. The BLM has implemented  
 8 an Allotment Management Plan to improve the range resources within the unit.

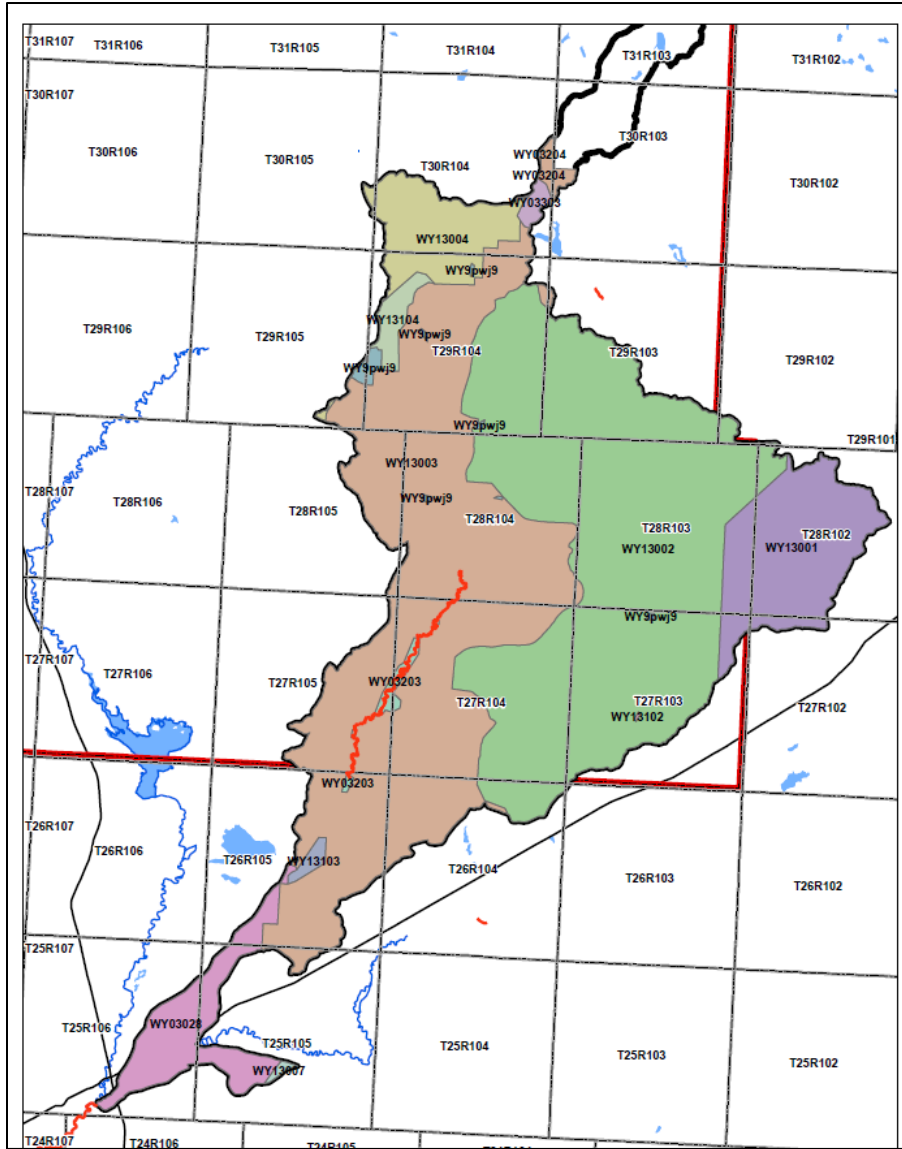
9  
 10 The Little Sandy grazing allotment, 13003, is another allotment within the watershed. The BLM has  
 11 allocated 7,725 total AUMs on 114,683 total acres in the allotment for grazing livestock. Of these  
 12 allotment acres, 65,947 (57%) lie within the Little Sandy watershed. The allotment is broken into  
 13 the Reservoir, Mountain, Dry Sandy, and Elkhorn pastures. Multiple permits are issued to users and  
 14 an Allotment Management Plan (AMP) has been implemented. The AMP, certified December 13,  
 15 1982 (RSBLM, 1982), provides detailed information on the grazing system and treatments. The  
 16 system uses a horseshoe pattern starting lower in the allotment, moving up, and then returning later  
 17 in the year. In addition to grazing by livestock, the AMP states that the allotment contains crucial  
 18 winter habitats for moose, elk, mule deer, and pronghorn antelope. Pronghorn migration corridors  
 19 also exist along with important Greater sage-grouse habitats, in which the area is now considered  
 20 part of the Sage-grouse Core Area (State of Wyoming Executive Order 2015-4  
 21 <http://psc.state.wy.us/pscdocs/download/SageGrouseExecOrder2015-7.pdf>). The AMP indicates  
 22 3700 AUMs per year are needed to support the wildlife (RSBLM, 1982).

23  
 24 The final allotment in the watershed is the Eden Project, 03028, having 3,131 total AUMs available  
 25 for livestock on 29,034 acres, of which 7681 acres (26%) lies within the Little Sandy watershed.  
 26 These numbers were taken from individual Allotment reports, and are summarized in the Table  
 27 below.

28

Allotment Name	Allotment Number	Total Acres	Total AUM's	Acres in Little Sandy watershed	% of total allotment acres
Prospect Mountain	13004	48,739	3,642	8,094	17
Little Prospect	13002	84,346	7,236	69,669	83
Little Sandy	13003	114,683	7,725	65,947	57
Eden Project	03028	29,034	3,131	7,681	26
				151,391 Little Sandy Acres	

29



1  
2 Figure 4 – BLM Allotments within the Little Sandy Watershed  
3

4 The BLM has monitored the Little Sandy watershed extensively in the past. Utilization has been  
5 measured using the Landscape Appearance method during years 2001, 2002, 2003, 2009, 2010, 2016.  
6 Utilization transects were conducted near the Little Sandy River. Photos were taken in these areas as  
7 part of the documentation. A series of photographs exist south of the Little Sandy Grazing  
8 Association Headquarters from 2001, showing that the creek had totally dried up. Proper  
9 Functioning Condition (PFC) assessments have also been completed on multiple reaches within the  
10 watershed in years 1995, 1998, 2006, 2010 and 2016 (BLM, 2016).  
11

12 Wildlife

13 The Little Sandy watershed is an important winter range area for big game in Sublette County. The  
14 Wyoming Game and Fish Department (WGFD) identify crucial elk (*Cervus canadensis*) winter range  
15 located around the Prospect Mountains and winter range designated near Highway 191 north of Big  
16 Sandy Reservoir. Land users have noted use by elk, expressing estimated numbers in the 300 to 400  
17 range; WGFD estimates the numbers of elk using the area in the winter to be 500 to 700 head.



1 Much of the area is designated as mule deer crucial winter range, encompassing a big chunk of the  
2 area south of Buckskin Crossing, along the west and south slopes of Little Prospect, and south all  
3 the way along the Little Sandy River and east of Elk Mountain. Mule deer (*Odocoileus hemionus*)  
4 using the area are estimated to be 6,000 to 10,000 animals. Pronghorn antelope (*Antilocarpa*  
5 *americana*) crucial winter range is located in all directions around the Big Sandy Reservoir and the  
6 population there is estimated in the 4,000 to 6,000 range.  
7

8 Using conservative numbers, the grazing by the amount of deer and elk identified by Game and Fish  
9 during the winter is then estimated at 4395 AUMs, based on 5,000 deer and 500 elk during a 5  
10 month period. When compared to the Little Sandy Grazing Allotments number of AUMs allotted  
11 by BLM of 7725 AUM's for livestock, it is clear that wildlife can have a significant impact within the  
12 watershed.  
13

14 WGFD has also monitored grazing impacts on woody browse species in the Little Sandy watershed.  
15 WGFD surveyed the Tabernacle Butte winter range using sagebrush transects in 2009. The data for  
16 hedging indicated 64% of plants were severely hedged, 34% moderately hedged and 4% were lightly  
17 hedged. This takes into account historic pressure and structure of the plant due to browsing  
18 patterns over time. The 2009 age class diversity data indicated 0% of the stand is young, 62% is  
19 mature, 36% is decadent and 2% is dead. The data shows a lack of recruitment, and supports the  
20 observations of generally poor vigor. The result of less recruitment and poor vigor is less than  
21 desirable annual leader production on these Wyoming big sagebrush plants according to the WGFD  
22 in 2009.  
23

24 A large portion of the stream's riparian area, from just off the forest boundary along the Big Sandy  
25 River, Little Sandy River, Lander Creek and the Sweetwater River is designated as crucial winter  
26 range for moose. Wyoming Game and Fish has estimated approximately 30 to 50 moose use these  
27 areas. The Little Sandy drainage was estimated to have lower populations of moose less than 10.  
28 These estimates by the Wyoming Game and Fish are based on flights since 2008. Additionally, the  
29 Sublette County Conservation District (SCCD) noted evidence of use via sign (i.e. pellets or animals)  
30 by moose and deer during their site visit in May of 2011. Numerous dead deer in the area were  
31 documented by SCCD counting upward of 25 deer carcasses. Presumably these were winter kill due  
32 to the harsh winter of 2010/2011. The winter of 2016 also had a large effect on the deer  
33 population. Typical of big game wintering areas, some willows and shrubs showed evidence of  
34 moderate to heavy browsing. More complete data on wildlife use is not currently available, and both  
35 the SCCD and WGFD expressed a need to develop a better data set to accurately determine browse.  
36

37 This area in general is considered important Greater sage-grouse habitat. The vast majority of the  
38 watershed lies within the Greater South Pass Sage Grouse Core Area. The BLM also recognizes this  
39 area as a Sagebrush focal area. The area contains all of the year round habitats needed for the bird  
40 to survive. There are several active leks located in the vicinity, as well as potential winter use and  
41 winter concentration areas.  
42

43 In 2015, Governor Mead signed Executive Order 2015-4 for Greater Sage-Grouse Core Area  
44 Protection. This executive order establishes that state agencies will work collaboratively with local  
45 governments and private landowners to maintain and enhance Greater Sage-Grouse habitats and  
46 populations in a manner consistent with the Executive Order. Should funding be awarded from  
47 state or federal agencies to implement portions of this watershed plan that involve land-disturbing  
48 activities in core areas, coordination with the funding agency and/or Wyoming Game and Fish

1 Department may be required to ensure consistency with the Executive order and minimize impacts  
2 to Greater Sage-Grouse populations and habitat. If any such consistency reviews are needed to  
3 implement action items of this watershed plan, all involved parties will work together to ensure the  
4 necessary review and analysis are completed.

5  
6 The Little Sandy shows evidence of past and present beaver (*Castor canadensis*) activity. Historically,  
7 there was likely a larger beaver population that could have effectively widened the riparian area.  
8 Beaver are both a source of stability and sediment in these stream systems. Beaver dams slow water,  
9 collecting sediment contributing, and contribute to water filtration and purification; however when  
10 the dams wash out, the stored sediment and energy is released downstream. When this occurs the  
11 river must compensate and find a new dynamic equilibrium. The most important factor to  
12 maintaining a beaver population would be the presence of sufficient woody materials for the beaver,  
13 as well as protection of willows from the same animals until woody vegetation can be well  
14 established.

15  
16 Other important species have also made historical use of the watershed and continue to do so. The  
17 watershed provides habitat to multiple species identified by the United States Fish and Wildlife  
18 Service (USFWS). In addition to Greater sage-grouse and pygmy rabbits, portions of the watershed  
19 are listed as habitat for Canada lynx (*Lynx canadensis*), American bittern (*Botaurus lentiginosus*), Bald  
20 eagle (*Haliaeetus leucocephalus*), Brewer's sparrow (*Spizella breweri*) Burrowing owl (*Athene cunicularia*),  
21 Ferruginous hawk (*Buteo regalis*), Mountain plover (*Charadrius montanus*), Sage sparrow (*Artemisiospiza*  
22 *nevadensis*), Swainson's hawk (*Buteo swainsoni*), white-tailed prairie dog (*Cynomys leucurus*), bluehead  
23 sucker (*Catostomus discobolus*), and the flannelmouth sucker (*Catostomus latipinnis*; (USFWS, GIS).  
24 SCCD also noted use by pygmy rabbits with the presence of burrows and pellets found along many  
25 of the sagebrush terraces with loamy and sandy soils, as well as raptors perching on top of ridges  
26 and in crevices of the soil outcrops.

### 27 Fisheries

28  
29 In the Little Sandy watershed the following species are prevalent. Three Wyoming native fish  
30 species, bluehead sucker, flannelmouth sucker, and roundtail chub *Gila robusta*, commonly referred  
31 to as “the three species”, are present and are facing serious threats to their populations. The three  
32 species have declined dramatically throughout their native range in Wyoming, causing concern over  
33 the sustainability of their populations (Wheeler 1997, Bezzerides and Bestgen 2002, Gelwicks et al.  
34 2009). Habitat degradation, including altered flow regimes and interactions with non-native fishes  
35 such as white sucker *Catostomus commersoni*, lake chub *Couesius plumbeus* and Utah chub *Gila atraria*,  
36 have facilitated these declines (Wheeler 1997, Bezzerides and Bestgen 2002, Bower 2005, Gelwicks  
37 et al. 2009).

38  
39 Native bluehead and flannelmouth suckers face risks of hybridization with non-native suckers.  
40 Introduced white sucker hybridize with native bluehead and flannelmouth suckers (Baxter and Stone  
41 1995, Douglas and Douglas 2007) to produce viable offspring (Douglas and Douglas 2007,  
42 McDonald et al. 2008). This poses a serious threat to the genetic integrity of their populations  
43 (Gelwicks et al. 2009). Hybridization will continue to threaten native sucker populations until non-  
44 native fish are extirpated from their habitats (Douglas and Douglas 2007, McDonald et al. 2008,  
45 Gelwicks et al. 2009).

46  
47 The Wyoming Game and Fish Department has identified four priority drainages: the Big Sandy  
48 River, Bitter Creek, Little Sandy Creek, and Muddy Creek within the upper Green River and Little

1 Snake River watersheds in southern Wyoming as important habitat for the enhancement of  
2 populations of bluehead sucker, flannelmouth sucker and roundtail chub populations in Wyoming.  
3 Wyoming Game and Fish has worked cooperatively with other agencies and landowners within the  
4 Little Sandy River watershed. Electrofishing surveys, to identify the relative abundance and  
5 distribution of native non-game fish species within the drainage were conducted during the summer  
6 of 2003. Non-native fish removal was conducted in 2009, 2010, and 2011 to benefit native bluehead  
7 suckers and flannelmouth suckers. The focus of this project was to conserve native fish populations  
8 by removing as many non-native fish as possible in priority drainages prior to future native fish  
9 salvage and chemical restoration. Single pass electrofishing and picket weirs were used to  
10 mechanically remove non-native fishes and sample native fish populations. In the Little Sandy River  
11 a total of 25,413 fish were captured during removal efforts in 2009-2011. Of those, 16,912 non-  
12 native fish were removed from the Little Sandy River. White suckers were the most abundant  
13 species in each year. Bluehead and flannelmouth suckers increased from 28% of the 2009 catch to  
14 32% of the 2011 catch even though the total number decreased from 2010 to 2011 and were  
15 captured in downstream reaches more frequently. Declines in the relative abundance of non-native  
16 fish were observed following mechanical removal efforts. Fewer adult white suckers were captured  
17 after each year of removal.

18  
19 A total of 3,193 fish were captured during removal efforts from 2009 to 2011 on Long Draw and  
20 3,160 non-native fish were removed. White suckers represented 99% ( $n=3,146$ ) of the non-native  
21 fish removed; fish < 6 in dominated the sample of white suckers. Three bluehead suckers and six  
22 flannelmouth suckers were captured in 2009 (all 4-7 in), but none were found in 2010 or 2011.

23  
24 While this work has not completely eliminated the threats posed by non-native fish, it alleviated the  
25 pressures (hybridization, competition and predation) placed on native fish populations by introduced  
26 fish. For example, population structures suggested that recruitment occurred in native fish  
27 populations in the Big Sandy River and Little Sandy and Muddy Creeks. Recruitment of native  
28 suckers in the Big Sandy River had not been observed in several years prior to the removal efforts.  
29 Future management of native non-game fish in the Little Sandy River watershed will focus on the  
30 salvage and holding of native fish and chemical treatments to eliminate non-native fish populations.  
31 Additional details on the Little Sandy Creek removal efforts can be found by inquiring with the  
32 Wyoming Game and Fish Department.

33  
34 The Wyoming Game and Fish Department installed a sheet piling fish migration barrier on Long  
35 Draw 2012. The barrier was installed in preparation for upcoming chemical treatments to eliminate  
36 non-native fish. The barrier is intended to keep non-native fish in the Little Sandy River from  
37 reinvading Long Draw. The Wyoming Game and Fish Department chemically treated Long Draw  
38 with liquid rotenone in 2015 and again in 2016. Both treatments were considered successful. Only a  
39 small number of Lake Chub were killed by rotenone during the 2016 treatment. The chemical  
40 treatments eliminated a large population of white suckers that was impacting the native suckers in  
41 the Little Sandy River.

42  
43 As part of their 2009 Strategic Habitat Plan, the WGFD has recommended that the Little Sandy  
44 River drainage (which includes the delineated reach) should receive high management priority given  
45 its unique populations of two native sucker species (i.e., flannelmouth sucker and bluehead sucker)  
46 and the ability to manage non-native fishes in this drainage. Both of these suckers are endemic to  
47 the Colorado River Basin and have been experiencing range-wide declines in distribution and  
48 abundance. The WGFD has recommended solutions to management of this crucial habitat in no

1 particular order that includes restoration and habitat enhancement for native suckers; reductions in  
2 sediment yield to aquatic habitats from grazing and timber practices; restoration of aspen, willow  
3 and other woody riparian vegetation; encourage expansion of beaver colonies; advocate habitat  
4 protection and minimize future energy development impacts in the area.

#### 5 6 Habitat requirements of native suckers

7 Bluehead suckers are widely distributed in the Colorado River Basin and occur in main-stem rivers  
8 and tributary streams from the mouth of the Grand Canyon upstream to headwater reaches of the  
9 Green and Colorado rivers (Bezzarides and Bestgen 2002, Baxter and Stone 1995). They are more  
10 frequently found in headwaters than flannelmouth suckers (Baxter and Stone 1995). Large adults are  
11 associated with deep pools, undercut banks, moderate to fast current velocities, and rocky substrates  
12 (Sigler and Miller 1963). Sublette et al. (1990) noted spawning to occur on gravel beds in shallow  
13 water. Maddux and Kepner (1988) observed egg deposition in shallow redds excavated in stream  
14 gravel.

15  
16 Flannelmouth suckers typically inhabit pools and deeper runs in the Colorado River Basin, but they  
17 are also found in small streams and occasionally in lakes (Sigler and Miller 1963, Baxter and Stone  
18 1995). Juveniles select for slower current velocity habitats, such as backwaters, eddies, side channels,  
19 and shallow riffles (Bezzarides and Bestgen 2002). Substrate preferences vary from mud and silt to  
20 cobble and gravel (Sigler and Miller 1963, McAda et al. 1980), but adults are often more abundant  
21 over hard substrates, rather than sand and silt (Holden and Stalnaker 1975a). Flannelmouth  
22 spawning aggregations have been observed in tributaries of the Lower Colorado River in glides or  
23 slow riffles, over medium –course gravel substrate (Weiss 1993, Otis 1994).

#### 24 25 Recreation

26 The Little Sandy Watershed continues to be a world class location for wildlife and natural resource  
27 based recreational activities. The [Bridger-Teton National Forest](#) sits at the headwaters of the  
28 watershed, with a small section of the [Bridger Wilderness](#) at the very top. This area provides  
29 recreation to visitors and sportsman every year that use the area for hiking, camping, fishing,  
30 hunting, and many other recreational pursuits.

31  
32 Outdoor enthusiasts utilize the Forest Service and BLM lands for dispersed camping throughout the  
33 year, although the USFS has not developed or designated a campground in the watershed.  
34 Recreational use of dirt roads and trails is permitted and encouraged by the land management  
35 agencies in the watershed, and maps are made available to the public at local offices and area  
36 retailers to inform the general public of the roads and trails available for automobiles, four wheel  
37 drive vehicles, four wheelers, motorcycles, snowmobiles, and any other motorized transportation.  
38 Trails within the wilderness are not open to any motorized transportation, and are also closed to  
39 bicycles.

40  
41 Hunting opportunities are abundant in the watershed, and big game hunting access is prevalent due  
42 to the large amount of public land present, although most of the riparian acreage is primarily private  
43 with some state lands. The Wyoming game and fish department has identified large sections of the  
44 watershed, including the impaired segment, as critical habitat for big game species. According to  
45 Wyoming Game and Fish statistics, 184 Elk were harvested in Elk Area 99 in 2010, which  
46 encompasses the Little Sandy Watershed. In addition, 1398 Mule Deer were taken in the same  
47 period, that being within the entire herd unit (Wyoming Game and Fish, 2010). These animals also  
48 use the watershed continuously from December to April. These numbers are representative of the

1 annual harvests and wintering that can be expected in the area. In addition, antelope, moose, and  
2 numerous other small and big game species are annually present in the watershed in significant  
3 numbers.

#### 4 Industry

5 Although this watershed has not been subject to high amounts of pressure from the extractive  
6 energy industry, it lies close to areas that have been developed and utilized. Gas production has  
7 been prevalent in much of the Green River Basin and within Sublette County, but there are only  
8 three permitted gas wells within the watershed, two are listed as abandoned, and one is idle at this  
9 time. Traffic has increased with potential for further increase in the near future. The upper section  
10 of the watershed was identified as a possible Wind Energy Development Zone, though no  
11 developments have yet occurred in that area (SuiteWater, 2017).

### 12 **3. Watershed Assessment and Condition**

#### 13 ***3.A. Water Quality Summary***

##### 14 Sublette County Conservation District

15 The Sublette County Conservation District (SCCD) has been monitoring surface water in Sublette  
16 County since 2000. In 2008, SCCD began monitoring the Big and Little Sandy Rivers. Two surface  
17 water sites were established on each of the rivers for a total of four sites. BS1 upper site and BS2  
18 lower site on the Big Sandy River, and LS1 upper site and LS2 lower site on the Little Sandy River.

19 Chemical samples and field data are collected five times per year (before high water, during high  
20 water, after high water, early fall and late fall) at all four sites. Chemical analysis includes alkalinity,  
21 bicarbonate, carbonate, calcium, chloride, magnesium, nitrogen (Nitrate as Nitrite+N), phosphorus,  
22 potassium, sulfate and sodium. Field parameters include: dissolved oxygen (mg/L and %), pH,  
23 conductivity, total dissolved solids and turbidity. Flows are measured when staff is safely able to do  
24 so.

25 Macroinvertebrates (aquatic insects) are collected at two sites BS1 and LS1 using Surber Samplers  
26 and floating bug traps are used at BS2 and LS2 to collect aquatic insects. The macroinvertebrate  
27 samples collected by SCCD staff are sent to an aquatic ecologist for identification and analysis.  
28 Following the fifth year of data collection a report will be prepared using the macroinvertebrate data  
29 collected at each of the four sites (Marshall, B. A. 2015 Baseline Biological Condition of the Big  
30 Sandy River and the Little Sandy River in Sublette County, WY).

31 Grants from WDA/WACD and monies from Sublette County have paid for the surface water  
32 monitoring program on the Big and Little Sandy Rivers.

##### 33 USGS

34 In 1982 the United States Geological Survey (USGS) produced a document titled “Sediment  
35 transport and source areas of sediment and runoff, Big Sandy River Basin, Wyoming.” (Kircher, J.  
36 1981) This report detailed some aspects that are still pertinent on Little Sandy River today, such as  
37 geology, physiography, soils, climate, geomorphology, vegetation and land use, stream flow, channel  
38 shape and size, sediment sources and transport, suspended loads, bed loads, total transport rate,  
39 source areas of sediment and runoff, factors affecting sediment, yield, and discussion of these issues.

1  
2 The report notes specifics of the Little Sandy. Specific notes and calculations were made of related  
3 channel shape and size. USGS notes that channel shape and size is complex, resulting from the  
4 interaction of multiple factors such as the lithology, amount, and depositional forms of the sediment  
5 load, as well as the hydraulic factors related to water flow. The USGS notes a trans-basin diversion  
6 of water from the Little Sandy to the Sweetwater River for irrigation and notes that this may affect  
7 natural flow.

8  
9 The USGS found that Geology was composed of Tertiary and Cretaceous mudstone, siltstone,  
10 sandstone, and shale, all of which were easily eroded. They determined that the geology of the  
11 region was a major factor in contributing to the large sediment production. The eroding and  
12 weathering of bedrock was noticeable in the watershed and its tributaries, so that sediment rates  
13 could at least partially be explained by geology.

14  
15 There is a downstream increase in sediment transport rate once the streams leave the glacial deposits  
16 and mountains and flow across the semi-arid plains. The stream carries almost no sediment in its  
17 upper reaches, very few point bars existed and there was large stream capacity to carry more than the  
18 supplied sediment. Many locations exhibited mass wasting along the banks. The stream leaves the  
19 glaciated terrain and flows through a more erodible region, and the pattern changes to meandering.  
20 As the stream flows it has a large capacity for sediment, but little is supplied by its tributaries,  
21 therefore, the banks and bed become the main sediment source for the stream.

22  
23 In summary, the USGS report concluded that there was a large increase in sediment load within the  
24 Big Sandy below the confluence with the Little Sandy, and that the sediment came primarily from  
25 the load in Pacific Creek. Furthermore, it indicates that sedimentation was caused by the erodible  
26 basin material and the semiarid climate.

### 27 WDEQ Monitoring Activities

28  
29 In 2004, WDEQ began intensive monitoring of the Little Sandy to insure that it fully supported  
30 designated uses as defined by the law. As previously noted the Monitoring and Assessment Program  
31 of the Wyoming Department of Environmental Quality-Water Quality Division (WDEQ/WQD)  
32 assesses the water quality and makes designated use-support recommendations for streams, rivers,  
33 lakes, reservoirs and wetlands in Wyoming. The Little Sandy River is categorized as a Class 2AB  
34 water throughout its entire length, it is protected for cold-water fisheries, non-game fisheries,  
35 drinking water, fish consumption, aquatic life other than fish, recreation, wildlife, industry,  
36 agriculture and scenic value.

37  
38 The Little Sandy River was originally placed on Wyoming's 1996 303(d) List for partial-support of  
39 coldwater fisheries and other aquatic life uses for an undetermined distance upstream and  
40 downstream of Elkhorn Junction. This listing was based on information provided by the Wyoming  
41 Game and Fish Department (WGFD) and the Natural Resources Conservation Service (NRCS).  
42 Suspected causes of the impairment were siltation (sedimentation) and elevated salinity, total  
43 dissolved solids (TDS) and/or chlorides that possibly originated from rangeland and natural sources.  
44 The Little Sandy River was ultimately removed from the 1996 303(d) List due to an absence of  
45 credible data to substantiate the impairment and subsequently placed on Table E of Wyoming's 1998  
46 305(b) report. Streams on the 1998 Table E list including Little Sandy River, required the collection  
47 of credible data (biological, chemical and physical data) to determine the validity of impairments  
48 described on Wyoming's 1996 303(d) List.

1  
2 The required monitoring was conducted by WDEQ/WQD in 1998 and 2003 indicated all  
3 designated uses were supported in the Little Sandy River upstream of Elkhorn Junction and that  
4 elevated salinity, TDS and chlorides were not a concern in the Little Sandy River. However, the  
5 Little Sandy River's ability to support fisheries and other aquatic life designated uses downstream of  
6 Elkhorn Junction for several stream miles (i.e., reach of concern), appeared to be compromised due  
7 to channel aggradation caused by excess sediment contributions from accelerated stream bank  
8 erosion.  
9

10 The 1998 and 2003 assessments were conveyed to the United States BLM in March of 2004. The  
11 BLM, in return, contributed a plan that the BLM in cooperation with the Little Sandy Grazing  
12 Association had worked to modify grazing practices within the Little Sandy grazing allotment. This  
13 plan encompassed the reach of concern and includes BLM, Wyoming State Lands and private  
14 holdings. Grazing practices were modified through additional fencing and rotational grazing, to  
15 improve riparian habitat and bank/channel conditions and ultimately allow the BLM to comply with  
16 their standards for healthy rangelands. WDEQ/WQD determined that a multi-year monitoring of  
17 the reach of concern was warranted to evaluate trends in physical, biological and chemical  
18 conditions of the stream following the initiation of the modified grazing management plan.  
19

20 In July 2004, the WDEQ/WQD hosted a field tour of the Little Sandy River reach of concern, to  
21 convey findings from the agency's 2003 assessment, to further understand the watershed and the  
22 existing and proposed modifications to the grazing management plan and discuss plans for a multi-  
23 year monitoring design. The tour was attended by representatives from the WDEQ/WQD,  
24 USBLM, Sublette and Sweetwater County Conservation Districts and the Little Sandy Grazing  
25 Association. With input from the aforementioned entities, the WDEQ/WQD committed to  
26 monitor the Little Sandy River reach of concern over a five-year period beginning in  
27 August/September of 2004. This modified grazing plan was implemented in the spring of 2005. The  
28 monitoring objectives were to 1) gather information to document trends in the physical and  
29 biological condition of the stream as a result of modified grazing management, 2) identify potential  
30 source(s) of physical instability/sediment and with results of the monitoring 3) evaluate chemical,  
31 physical and biological conditions of the Little Sandy River with respect to Wyoming water quality  
32 standards to determine designated use support.  
33

34 Information from the 2004-2008 monitoring indicated the Little Sandy River from a point  
35 approximately 11 stream miles below Elkhorn Junction near the landmark Squaw Teat, downstream  
36 18 stream miles to near the Sublette/Sweetwater County line, is partially/non-supportive of its  
37 designated fisheries and other aquatic life uses (i.e. impacted reach). The weight-of-evidence showed  
38 a departure in the biological condition of this impacted reach of the Little Sandy River from the  
39 expected regional reference condition. In addition, there was an appreciable decline in biological  
40 condition with distance downstream within the upper four stream miles of the impacted reach.  
41 Within the lower 14 stream miles there was a slight increase in biological condition. Biological  
42 condition within the impacted reach fluctuated considerably from 2004 to 2008 with no consistent  
43 positive or negative trend during the study period.  
44

### 45 ***3.B. Actual Bank Erosion Measurements and Results***

46 There are several lines of physical evidence that when combined and weighted, indicate an alteration  
47 to the sediment regime of the Little Sandy River. Information from the sediment competence,  
48 sediment capacity, stream bank erosion, channel bed materials, channel profile and channel fill and

1 scour analyses provide the strongest evidence that channel aggradation is occurring in the Little  
2 Sandy River at all three multi-year monitoring sites, though this is particularly pronounced from the  
3 BLM enclosure downstream.

4  
5 Based on the most recent 2008 stream bank erosion rates, approximately 1,564 tons (or 59% of the  
6 estimated total excess sediment load for the impacted reach) of excess sediment is contributed  
7 annually by accelerated stream bank erosion within the upper four stream miles of the impacted  
8 reach. Likewise, accelerated stream bank erosion contributes 1,088 tons/yr (41% of the total excess  
9 estimated total load) within the remaining 14 stream miles of the impacted reach.

10  
11 Measurements of stream bank erosion rates among all three multi-year monitoring sites using bank  
12 profiles are presented in the Water Quality Condition and Designated-Use Support Determination  
13 for the Little Sandy River, Green River Basin, 2004-2008 (WDEQ 2010; see Figure 5 and Appendix  
14 13). Corresponding Bank Erosion Hazard Index (BEHI) and Near Bank Stress (NBS) ratings varied  
15 among years, though were generally higher at 'Above Willow Enclosure' relative to the other two  
16 sites. In several instances where annual BEHI and NBS ratings were both low, stream bank erosion  
17 was not evident, particularly at 'Willow Enclosure' and 'Below Willow Enclosure'. For more  
18 information refer to WDEQ 2010 *Water Quality Condition and Designated Use- Support Determination for*  
19 *the Little Sandy River, Green River Basin, 2004 -2008* report.

20  
21 Based on BEHI/NBS ratings at bank profiles and reach-wide, predicted annual stream bank erosion  
22 rates at each site using Rosgen's (2006) BANCS model for the Colorado River Basin were close to  
23 measured values on the Little Sandy River, though the Colorado curve generally over-predicted  
24 annual stream bank erosion rates (Appendices 10-12 in WDEQ 2010). To provide the most accurate  
25 estimation of annual stream bank erosion rates, a BANCS model was developed specifically for the  
26 Little Sandy River based on measured stream bank erosion rates at bank profiles with associated  
27 BEHI/NBS ratings (Appendix D).

28  
29 The Little Sandy River BANCS model provided a lower, more accurate estimation of annual stream  
30 bank erosion on the Little Sandy River relative to the Colorado Basin BANCS model (Appendices  
31 10-12). Based on the BANCS model developed for the Little Sandy River the mean stream bank  
32 erosion rate over the study period was significantly different between sites with 'Above Willow  
33 Enclosure' having the highest mean rate of 0.0678 tons/yr/ft, 'Below Willow Enclosure' the lowest  
34 mean rate of 0.0369 tons/yr/ft and 'Willow Enclosure' falling between at 0.0517 tons/yr/ft  
35 (Appendices 4 and 10-12 in WDEQ 2010).

36  
37 There was also a significant difference in mean stream bank erosion rate for all sites combined  
38 between years with the greatest amount of erosion occurring in 2005, followed by 2004, 2007 and  
39 2008 (Table 2 and Appendix 4 in WDEQ 2010). From 2004 to 2008, annual stream bank erosion  
40 rates declined at all sites with the greatest decline of 65% at 'Below Willow Enclosure', the smallest  
41 decline of 13% at 'Above Willow Enclosure' and 'Willow Enclosure' with a 49% decline (Table 2,  
42 Figure 6 in WDEQ 2010). Though an overall 13% decline in annual stream bank erosion rate was  
43 observed at 'Above Willow Enclosure', there was a 50% decrease from 2005 to 2007 followed by a  
44 70% increase from 2007 to 2008 (Figure 6 in WDEQ 2010).

45  
46 An evaluation of annual stream bank erosion rates per segment, associated BEHI/NBS values, and  
47 segment location over time indicate that the majority of bank erosion (and consequently annual  
48 stream bank erosion rate reductions) among all three sites primarily occurs along outside meander



1 bends and secondarily along straight sections (Appendices 14-16 in WDEQ 2010). Annual stream  
2 bank erosion rates along outside meander bends are greatest at 'Above Willow Exclosure' (Appendix  
3 14 in WDEQ 2010). BEHI values among all years and sites indicate that segments of channel where  
4 stream bank erosion rates were greatest were characterized by steep bank angles; minimal surface  
5 protection, root depth and density from riparian vegetation; and high bank-height ratios as shown in  
6 Figure 5. High bank-height ratios indicate more bank surface is exposed above the bankfull elevation  
7 and thus the bank is at greater risk for surface erosion, freeze/thaw, bank slumping and failure and  
8 other mass erosion processes (Rosgen 2006). Furthermore, reaches of the channel where stream  
9 bank erosion was greatest were characterized by greater densities of invasive species and upland  
10 vegetation; along with limited willow; hoof impact; hummocks in the riparian zone and/or  
11 compacted soils (Figure 7 in WDEQ 2010). The combination of these indicators suggests that  
12 grazing pressure is high in these areas (Skinner et al. 2000). Associated NBS values of 'Moderate' to  
13 'High' also characterized segments of eroding bank where stream bank erosion rates were greatest.  
14

### 15 ***3.C. Causes of Impairment***

16 Non-attainment for fisheries and other aquatic life designated uses in the impacted reach is primarily  
17 due to channel aggradation from excess sediment contributions that become more pronounced with  
18 distance downstream. The primary source of the excess sediment originates from accelerated stream  
19 bank erosion within the Little Sandy River of which the cause is identified as grazing. Areas where  
20 accelerated stream bank erosion occurs is characterized by absent or limited diversity and density of  
21 riparian vegetation, extensive stands of invasive upland vegetation, limited dead and tunneled willow,  
22 hoof impact, hummocks in the riparian zone, and compacted soils. All of these indicators are  
23 suggestive of high grazing pressure. The weight-of-evidence shows that within the impacted reach,  
24 the upper four miles is a geomorphic degraded section that is the primary source of the excess  
25 stream bank sediment. The lower 14 stream miles of the impacted reach, though still experiencing  
26 appreciable channel aggradation, exhibited slightly greater in-stream aquatic habitat and reduced  
27 bank erosion relative to the upper four stream miles. It appears this marginal difference in physical  
28 condition is responsible for the slight increase in biological condition within the lower 14 stream  
29 miles of the impacted reach. Temporary additions of sediment to the already excess sediment load in  
30 the stream may occur as a result of beaver dam failures. As with accelerated stream bank erosion,  
31 these beaver dam failures are primarily attributed to the absence or limited cover and diversity of  
32 riparian vegetation along the stream banks. Legacy effects from historical channel adjustments do  
33 not appear to contribute significantly to the channel degradation and aggradation that currently  
34 exists in the Little Sandy River. Combined, this information translates to non-attainment of narrative  
35 criteria Sections 15 (Settleable Solids) and 21 (Protection of Aquatic Life) in WDEQ/WQD's  
36 Chapter 1 Water Quality Rules and Regulations within the impacted reach. No applicable numeric  
37 criteria were exceeded during the study period.

### 38 ***Monitoring of Impaired Segments***

39 The Little Sandy River at the three multi-year monitoring sites is, at a minimum, competent or has  
40 the stream energy necessary to transport the largest existing (coarse sand to fine gravel) and  
41 predicted (medium gravel) size of particle. However, 'Above Willow Exclosure' is at risk for  
42 potential channel degradation such as channel incision and/or stream bank erosion (relative to the  
43 other two sites) due to excess competency from a combination of greater than predicted mean  
44 bankfull riffle depths and channel gradients. During the initial study period, average net gains in  
45 bankfull cross-sectional area (4.88 ft<sup>2</sup>) and net losses in channel bed elevation (-0.17 ft), were

1 greatest at 'Above Willow Exclosure' relative to 'Willow Exclosure' (0.37 ft<sup>2</sup> , -0.01 ft) and 'Below  
2 Willow Exclosure' (0.00 ft<sup>2</sup>, 0.00 ft).

3  
4 The 2004-2008 survey data also suggest that the channel at all three sites, though particularly at  
5 'Willow Exclosure' and 'Below Willow Exclosure', is aggrading with sand and fine gravel because the  
6 largest existing particle moved at bankfull flows is less than what was predicted. Average net losses  
7 in bankfull cross-sectional area and gains in channel bed elevation were noted at 'Above Willow  
8 Exclosure' (-7.26 ft<sup>2</sup>, 0.28 ft), 'Willow Exclosure' (-4.74 ft<sup>2</sup>, 0.15 ft) and 'Below Willow Exclosure' (-  
9 7.55 ft<sup>2</sup>, 0.24 ft).

10  
11 It should be noted that the average net loss in bankfull cross-sectional area and gain in channel  
12 elevation at 'Above Willow Exclosure' only occurred at cross-section 1+73. Overall, 'Above Willow  
13 Exclosure' is primarily experiencing channel degradation rather than aggradation. Investigating  
14 where these gains and losses occurred revealed that most degradation occurred at riffle and to some  
15 degree run habitats whereas aggradation was more prominent at pool and to some degree glide  
16 habitats. Indeed, decreases in mean bankfull pool cross-sectional area, mean bankfull pool depth and  
17 the mean ratios of maximum pool depth to mean riffle depth at all three sites, particularly 'Willow  
18 Exclosure' and 'Below Willow Exclosure' indicate pool aggradation. This information combined  
19 with analyses of channel profiles and channel materials further supports the conclusion that channel  
20 aggradation is most prominent at 'Willow Exclosure' and 'Below Willow Exclosure'.

21 As a result of the data collected in their studies, the WDEQ found that a section of the Little Sandy  
22 River from the northern boundary of Section 33-Township 28 North-Range 104 West downstream  
23 17.7 miles to the Sublette/Sweetwater County line was not supporting its cold water fishery and  
24 aquatic life other than fish uses and this segment was added to the 303(d) list of impaired  
25 waterbodies in 2012.

26  
27 The reasons for the determination are: excess sediment contributions causing channel aggradation  
28 that are linked to contributions from accelerated stream bank erosion in reaches of the Little Sandy  
29 River experiencing channel degradation. These physical alterations have caused a decline in  
30 biological condition with distance downstream from the 'Lower' site and a departure from the  
31 expected regional biological condition. Accelerated stream bank erosion is most pronounced from  
32 the northern boundary of the USBLM Willow Exclosure upstream to the northern extent of the  
33 identified impacted reach. Excess sediment deposition or channel aggradation is most pronounced  
34 from the northern boundary of the USBLM Willow Exclosure downstream to the  
35 Sublette/Sweetwater County line. (WDEQ, 2011)

### 36 37 Past Resource Management Changes

38 Implementation of the modified grazing management plan may have reduced excess sediment  
39 contributions from accelerated stream bank erosion within the impacted reach. From 2004 to 2008,  
40 annual stream bank erosion rates declined between 49% and 65% within the lower 14 stream miles  
41 of the impacted reach, with only a marginal reduction of 13% in the upper four miles of the  
42 impacted reach where accelerated stream bank erosion is greatest. Associated with these reductions  
43 was an overall improvement in the percentage of stream banks covered by riparian vegetation,  
44 particularly within the upper four miles of the impacted reach. Below normal peak flows in 2007 are  
45 likely responsible for an exacerbation of channel aggradation during that year. However, accounting  
46 for the low flows of 2007, there has been no significant change in channel aggradation or  
47 degradation (other than a reduction in stream bank erosion) within the impacted reach during the  
48 study period.

1  
2 WDEQ determined that “although the excess sediment from accelerated stream bank erosion has  
3 reduced marginally over time, it has not been sufficient to result in appreciable improvements in  
4 overall channel aggradation/degradation nor biological condition of the impacted reach. It is  
5 speculated that the rate of improvement in stream bank erosion within the upper four miles of the  
6 impacted reach may be slower relative to the remainder of the impacted reach in part, because of the  
7 magnitude and extent of riparian disturbance. Consequently, noticeable improvements in channel  
8 aggradation and associated aquatic life use support in the impacted reach will not be realized until  
9 the upper four miles stabilizes appreciably and comes to equilibrium with its natural sediment  
10 regime. A stabilized channel with well vegetated stream banks should also help to reduce the  
11 frequency of future beaver dam failures. This may take considerably longer than the five years since  
12 the modified grazing management plan was implemented”.

### 13 14 ***3.D. Background Sediment Sources in Little Sandy***

15 The Little Sandy River, in the area of concern, has many contributing sources of sediment; some of  
16 which are caused by natural processes, as well as other factors that may have triggered erosion at  
17 accelerated rates in the past. Background or natural sediment sources include contributions from  
18 upland sites as well as from the stream banks and bed itself. Due to the geology and topographic  
19 features of the area, there is potential for a large amount of natural sediment to be transported  
20 through this system. Accelerated bank erosion is perceived as the major source of excess sediment  
21 contribution, which is the reason for the listing of the stream.

22  
23 Sediment is a natural component of a stream where the main sources include erosion of uplands,  
24 lateral movement of channels into stream banks and down-cutting of channel beds (Waters 1995).  
25 However, most natural sediment inputs are relatively small, occur gradually and can be incorporated  
26 by stream processes into nondestructive forms and quantities thereby maintaining a stream that is  
27 physically stable or in dynamic equilibrium (Waters 1995). Physically stable is defined as a stream’s  
28 ability in the present climate to transport the stream flows and sediment of its watershed, over time,  
29 in such a manner that the channel maintains its dimension, pattern and profile without either  
30 aggrading or degrading (Rosgen 1996).

31  
32 Streams are dynamic systems that go through a natural evolution over time. In their geomorphic  
33 lifespan, changes in stream power related to precipitation, bed loads, vegetation, base level, and  
34 climate can have significant impacts on the nature of the stream. Stream sediment load moved  
35 through a system is a product of complex interaction of energy, geology, climate, bed load, etc.  
36 Some deposited sediment if associated with vegetation can lead to better width to depth ratios over  
37 time, resulting in a system that is competent to move the average annual loads within them (Skinner,  
38 2000). However, streams that were in an equilibrium condition and that then see an increase in  
39 sediment input may show bank failure as a result of in-stream deposition that leads to stream  
40 widening. The condition persists until the additional sediment load is moved through the system.

41  
42 In the Little Sandy, there are two different parent materials with two separate erosion rates. The  
43 steeper stream reaches in mountainous areas of the Little Sandy tend to resist erosion due to the  
44 water running over minimally-erosive bedrock. Bed load materials, especially fine material, are more  
45 easily moved here. In the mid and lower sections of the Little Sandy watershed channels widen and  
46 become shallower. Vegetated banks here are keys to maintaining the continuity of these systems  
47 (Skinner, 2000).

1 Moving away from the streambed itself other natural sources of sediment are found. The geology of  
2 the mid and lower portion of the watershed is dominated by sedimentary bed rock including  
3 sandstones, siltstones and limestone. All are prone to weathering. These parent materials have  
4 produced sandy and sandy loam soils in the uplands that are susceptible to erosion if plant cover is  
5 not maintained. Areas of poor soil are naturally void of vegetation on a consistent basis.

6 The uplands that are relatively flat, with moderately deep to deep soils, have plant communities that  
7 can be characterized as healthy sagebrush/bunchgrass communities; which promote infiltration and  
8 slow run-off. Little sediment directly enters the stream from sheet or rill erosion in the uplands.

9 However, there are bluffs and knolls with exposed bedrock and shallow soils (< 10 in) that have  
10 naturally low vegetation cover. Intense rain events and spring run-off events can cause accelerated  
11 erosion and produce excess sediment loads in these areas. There are also numerous gullies that  
12 drain the watershed and that have the potential to contribute significant amounts of sediment during  
13 spring snow melt or intense rainstorms. In the arid soils of the watershed some sediment loads  
14 from stable upland communities of this type would be considered normal, and part of the  
15 natural/background load. Although this has not yet been quantified through field study, this could  
16 be a large source of sediment contribution.

#### 17 18 Anthropogenic Sources of Sediment

19 Anthropogenic disturbance such as riparian vegetation removal or over-utilization can result in  
20 excess available sediment contributions, erosion, and eventual channel aggradations downstream.  
21 Excess sediment can occur when riparian areas and stream banks are vegetation-limited or lacking in  
22 well-developed root structures. In this condition they cannot retain soil and stable stream banks.  
23 This can result is accelerated stream bank erosion at high flows. The increased supply of sediment  
24 moves with the high flows as suspended sediment, or is pushed along the channel bed creating  
25 scour. As flows recede, the excess sediments are deposited, changing the substrate composition,  
26 filling the interstitial spaces within gravels and cobbles; covering larger substrate and aquatic  
27 macrophyte habitat. Information obtained from the 2004-2008 survey indicates that stretches of the  
28 Little Sandy River with inadequate stream bank vegetation and accelerated bank erosion are likely  
29 responsible for channel aggradation in the stream (WDEQ, 2011).

#### 30 31 Other Sources of Sediment

32 Other sources of sediment originate directly at or in the stream. There are numerous alluvial fans  
33 and upper terraces that the stream contacts as it meanders through the valley. These areas have high  
34 banks that are incapable of supporting stabilizing riparian vegetation due to the height above the  
35 water table. These banks are susceptible to erosion and caving and contribute large amounts of  
36 sediment especially during high water. This natural contribution has also not been quantified.

37  
38 The excess sediment identified by WYDEQ is presumably coming from banks that should be stable,  
39 but are not and are eroding at an accelerated rate. Some historical events (some identified such as  
40 the extreme drought of the early 20th century, as well as other unknown events), have caused the  
41 stream to severely down-cut, resulting in an incised channel. Consequently, the drop in the water  
42 table has resulted in the stream losing regular access to its flood plain, further accelerating erosion  
43 and channel incising. Not having an accessible flood plain results in water flow exerting more force  
44 on the banks during frequent flood events.

45  
46 The lowering of the water table has impacted what vegetation can survive on the banks, changing it  
47 into a more mesic plant community on the banks and old flood plain. Upland plants have less dense  
48 root systems than riparian vegetation and are less capable of stabilizing the banks, resulting in

1 increased bank failure and increased sediment load. Down-cutting of the stream will also have  
2 affected the drainages and gullies coming in from the surrounding uplands, which would have to cut  
3 down to meet the base level of the stream, creating head cuts which travel into the uplands; causing  
4 an additional increase in sediment.

### 6 ***3.E. Sediment Sources to the Little Sandy River***

7 Reasonably accurate estimations of sediment contributions from known sources, under both existing  
8 and physically stable target conditions, are critical to understanding the sediment reductions needed  
9 in the Little Sandy River. Understanding necessary sediment reductions is important to develop and  
10 implement appropriate best management practices.

11  
12 Known sediment contributions in the Little Sandy River study area can be broadly categorized into  
13 four sources: bank erosion, uplands, roads and in-channel sediment storage. Using several years of  
14 data collected by the WDEQ, SCCD, USGS and others, sediment contributions from these sources,  
15 for both existing and target conditions, were predicted using five models - FLOWSED,  
16 POWERSED, BANCS and RII (part of the Watershed Assessment of River Stability and Sediment  
17 Supply (WARSSS) methodology (Rosgen 2006)) as well as the USDA Revised Universal Soil Loss  
18 Equation (RUSLE). Combined, these sediment quantifications were used to develop a total annual  
19 sediment budget and associated source allocations for both existing and target conditions. Brief  
20 descriptions of each model, input data and sediment predictions can be found in the following  
21 sections; detailed information can be found in WDEQ/WQD Technical Addendum found in  
22 Appendix D (2014)

#### 24 Total Annual Sediment Load

25 Total annual sediment load (bedload and suspended) for both existing and target conditions were  
26 estimated using FLOWSED at the lowermost extent of the impaired segment (endpoint). Stream  
27 flow data collected at USGS gage 09213500 (Big Sandy River near Farson, WY) combined with  
28 field-derived estimates of bankfull discharge within the Little Sandy River were used to develop a  
29 localized flow-duration curve for the ungaged Little Sandy River endpoint. Representative bankfull  
30 bed transport rate and suspended sediment concentration for stable conditions at the endpoint were  
31 derived from sediment data collected at gage 09213500. The measured bankfull flow of 334 cfs at  
32 the endpoint equated to a predicted stable bed transport rate of 1.07 kg/s and a suspended sediment  
33 concentration of 387.3 mg/L. Using these data in combination with the localized flow duration and  
34 sediment rating curves developed for the endpoint, FLOWSED predicted 2,203 tons of bedload and  
35 7,151 tons of suspended sediment, for a total annual sediment load of 9,354 tons/yr. Using the  
36 unstable sediment rating curve that represents existing conditions at the endpoint, FLOWSED  
37 predicted 4,914 tons of bedload and 8,019 tons of suspended sediment for a total annual existing  
38 sediment load of 12,933 tons/yr.

#### 40 Contributions from Stream Banks

41 Bank erosion rates and associated sediment loads were estimated with the Bank Assessment for  
42 Non-point source Consequences of Sediment (BANCS) model developed specifically for the Little  
43 Sandy River (WDEQ, 2010). The BANCS model estimates annual bank erosion rates based on  
44 integration of data obtained using two tools: Bank Erosion Hazard Index (BEHI) and Near-Bank  
45 Stress (NBS). BEHI and NBS measurements were collected along erodible banks at six monitoring  
46 sites in 2012 and 2013. Data obtained from these six monitoring sites in addition to bank erosion  
47 rates obtained from stream types similar to the Little Sandy River, represented best attainable or  
48 impacted bank erosion conditions among the six channel/valley type segments within the study area.

1 In order to validate estimates of bank erosion from the BANCS model, bank profile surveys were  
2 conducted at two representative cross-sections along erodible banks at each monitoring site.  
3 Measured annual bank erosion rates along with paired BEHI/NBS results obtained at bank profiles  
4 generally corresponded to predicted annual stream bank erosion rates from the BANCS model. For  
5 channel/valley type segments with both best attainable and impacted bank erosion conditions,  
6 estimated annual stream bank erosion rates representative of impacted conditions were 1.3 to 1.7  
7 times greater than best attainable bank conditions. Existing annual sediment load from bank erosion  
8 was calculated by multiplying the predicted annual stream bank erosion rate by the corresponding  
9 length of each stream bank condition within each channel/valley type segment and then summed  
10 for a total of 9,735 tons/yr. Results from this procedure indicated that contributions from  
11 accelerated stream bank erosion were greatest within the *Little Sandy Upper "Critical" Area* (identified  
12 later in this document). The target annual bank sediment load was calculated following the same  
13 procedure, though only annual bank erosion rates representing the best attainable condition for each  
14 channel/valley type segment were used, for a total of 7,911 tons/yr.

15

#### 16 Contributions from Roads

17 Contributions of road sediment to the study area from stream encroachment, crossings, exposed cut  
18 banks, road fill, surfaces and inadequate drainage were estimated using the Road Impact Index (RII)  
19 (Rosgen, 2006). This process involved delineating the study area into 58 sub-watersheds and using  
20 GIS to obtain the following information within each sub-watershed: acres of sub-watershed, acres  
21 of roads, number of stream crossings, valley slope position of roads, proximity of roads to streams,  
22 road age and road surfacing. This information was then used to determine an overall risk rating of  
23 potential sediment delivery from roads in each sub-watershed. Using the final RII values and road  
24 sediment delivery equations developed by Rosgen (2006), road sediment yield was calculated for  
25 each sub-watershed. The RII estimated the total existing sediment load from approximately 221  
26 miles of gravel and dirt roads in the study area to be approximately 129 tons/yr. Assuming all roads  
27 in the study area can achieve an optimal annual sediment yield of 2.9318 tons/yr/acre (value derived  
28 from road sediment delivery equations) under best management practices, the target annual road  
29 contribution would be 78.4 tons/yr.

30

#### 31 Contributions from Uplands

32 Target upland contributions of sediment in the form of surface, rill and gully erosion at the endpoint  
33 were deductively determined as the difference of the natural bank erosion contribution (7,911  
34 tons/yr.) and target road contributions (78 tons/yr.) from the total annual target sediment load  
35 (9,354 tons/yr.), for an upland contribution estimate of 1,365 tons/yr. It is assumed that under  
36 target conditions, the channel would be able to effectively transport flow and sediment with minimal  
37 to no aggradation; therefore, in-channel storage of sediment would be negligible. As there have  
38 been no documented significant anthropogenic disturbances to the uplands of the study area (less  
39 roads), the target upland contribution of 1,365 tons/yr. is also used to represent upland  
40 contributions under existing conditions.

41

#### 42 Contributions from In-Channel Storage

43 Using the predicted FLOWSED sediment rating curves along with geomorphic data obtained from  
44 cross-sections representative of stable (best attainable) and unstable channel conditions,  
45 POWERSED was used to predict sediment transport capacity and any resultant channel degradation  
46 or aggradation, which can then be used to infer whether in-channel storage of sediment is a source  
47 of excess sediment at endpoint. Existing geomorphic data (WDEQ, 2010) were used to obtain  
48 representative best attainable and unstable cross-sections for the endpoint. Using these data,

1 POWERSED developed discharge/unit stream power relationships at the endpoint, that in  
 2 combination with the corresponding FLOWSED predicted sediment rating curves, produced  
 3 relationships to calculate sediment transport capacity at each representative cross-section. The total  
 4 annual sediment transport capacity at the stable cross-section is then compared to that of the  
 5 unstable cross-section to evaluate channel stability (aggradation, degradation or stable).  
 6 POWERSED predicted that with an incoming total annual existing sediment load of 12,933  
 7 tons/yr., the channel at the endpoint is only able to effectively transport 7,981 tons/yr., indicating  
 8 aggradation or in-channel storage. Because the representative best attainable cross-sections used in  
 9 the POWERSED run were quasi-stable at best and that in-channel storage can vary spatially, the  
 10 difference between the total annual existing sediment load and the current channel transport  
 11 capacity cannot be used as a reasonably accurate quantification of in-channel storage. Rather, the  
 12 quantity of in-channel storage was deduced as the difference between the sum of the existing  
 13 upland, stream bank and road contributions from the existing total annual sediment load; the result  
 14 is an in-channel storage estimate of 1,704 tons/yr.

15

16 **Sediment Targets for the Little Sandy River**

17 The following table summarizes the total annual sediment load under both existing and target  
 18 conditions in addition to associated sediment allocations. In summary, for the Little Sandy River  
 19 study area to achieve a total annual sediment load under target conditions, 3,579 tons/yr. of  
 20 sediment would need to be addressed. The reduction of 1,824 tons/yr. from accelerated stream  
 21 bank erosion along with passive or active adjustment of the channel to the stable form, will  
 22 consequently contribute to the reduction of 1,704 tons/yr. of in-channel storage.

23

	<u>Existing Conditions (Unstable)</u>				<u>Target Conditions (Stable)</u>				<u>Reductions</u>	
	Bedload (tons/yr)	Suspended (tons/yr)	Total (tons/yr)	% of Total	Bedload (tons/yr)	Suspended (tons/yr)	Total (tons/yr)	% of Total	Difference (tons/yr)	% of Total
Stream Bank Erosion			9,735	75.3			7,911	84.6	-1,824	51.0
Road Contributions			129	1.0			78	0.8	-51	1.4
Upland Contributions			1,365	10.6			1,365	14.6	0	0.0
In-Channel Storage			1,704	13.2			0	0.0	-1,704	47.6
<b>Total Sediment Load</b>	<b>4,914</b>	<b>8,019</b>	<b>12,933</b>		<b>2,203</b>	<b>7,151</b>	<b>9,354</b>		<b>-3,579</b>	

24

25

26 **3.F. Water Quality Target for the Little Sandy**

27

28 Water quality in the Little Sandy must be improved by reducing the total eroded sediment and  
 29 associated deposition within the watershed in order for the Little Sandy to meet all of its designated  
 30 uses. The Water Quality Target is a numeric standard used to establish achievement of these water  
 31 goals. Each target is unique to its waterbody, and represents the achievement of water quality  
 32 standards for each waterbody to meet the requirements for all relevant beneficial uses. For  
 33 pollutants with a narrative standard, such is the case with the Little Sandy, narrative standard must  
 34 be translated into a measurable value. Since a numeric target is being established in this case to  
 35 address the narrative standard, the methodologies used to determine the numeric criterion, target,  
 36 and the links with the pollutant of concern have been described in detail above.

37

38 Initial WDEQ studies indicated that 1564 tons of erosion due to bank failure was present within the  
 39 impaired segment on an annual basis. The total in the system is equal to the this excess sediment,

1 plus the natural input from bank erosion, plus the sheet and rill erosion reaching the stream, plus the  
2 sediment present from gully erosion.  
3

### 4 **3.G. Critical Areas**

5 The WDEQ decision to list the Little Sandy as impaired was based on a weight of evidence  
6 approach, as well as centered on the effects of sediment deposition and aggradation in the section of  
7 the Little Sandy below a point identified as the “Above Willow Exclosure”. It also included the  
8 effects of incision and erosion above that point between “Above Willow Exclosure” and the  
9 “Lower” Sample point.  
10

11 As noted in the WDEQ study, the primary effects of sedimentation and deposition are clearly in the  
12 impaired reach. The primary contributions of sediment are from a combination of accelerated  
13 erosion within the upper section of the impairment in addition to the natural sources of sediment  
14 that exist in the uplands and hillsides surrounding the Little Sandy.

15 As noted previously in this document, land ownership is mixed within the watershed between  
16 federal, state, and private holdings. Because of the mixed ownership, a suite of approaches that can  
17 be used to for implementation will be best planned on a case by case basis in cooperation with the  
18 land owners, leases, and managers of the various holdings. The Critical implementation areas within  
19 the watershed will likewise need to be separated and re-evaluated in time to ensure that practical and

20 effective Best Management Practices are being thoughtfully selected to meet the needs of each area and land type, and that there actual implementation is possible. For the purposes of this initial plan, it is effective to think of the impaired segment in terms of three “critical areas.”

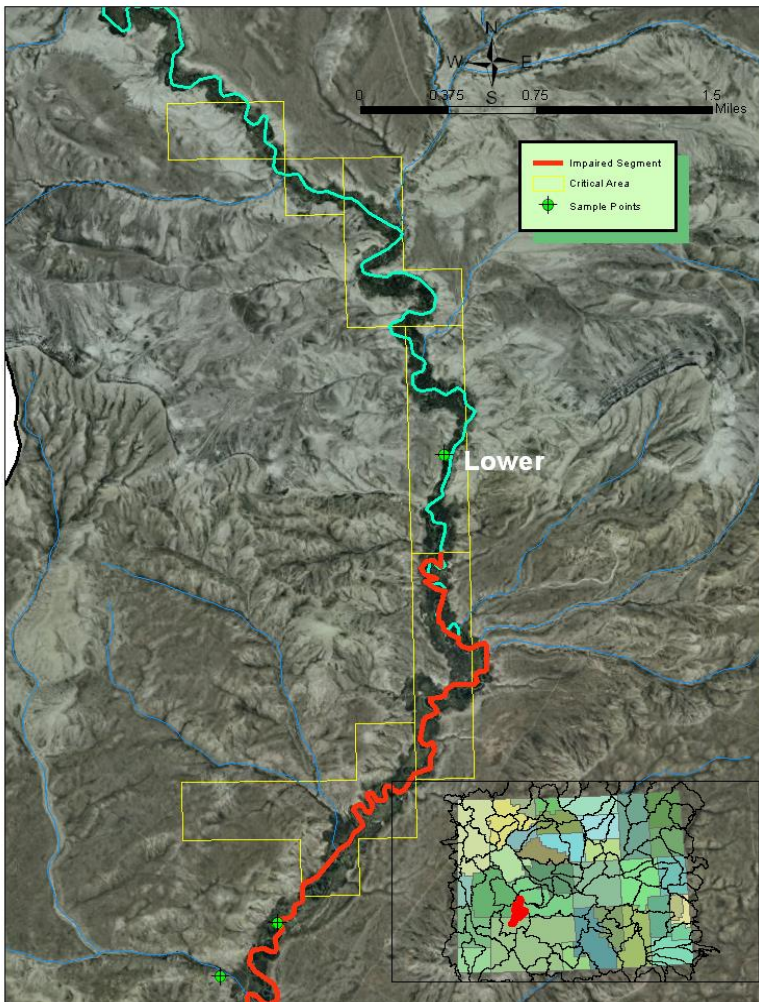


Figure 5– Upper “Critical” Section of the Little Sandy



1 contributed to the acceleration of incision and sediment transport. When incision begins, it moves  
2 from upward through the system. The “nick-point” for the incising has already moved past the  
3 lower impaired areas. Which means controlling further down-cutting that moves upstream will  
4 require aggressive implementation of  
5 practices within this first critical zone. The  
6 implementation practices employed here will  
7 likely require a combination of in-stream  
8 engineering practices, associated vegetation  
9 management, and continued grazing  
10 management in support of the engineered  
11 and vegetative controls.  
12 It is advantageous that this section of the  
13 stream is primarily made up of private lands  
14 and state leases. The selection and  
15 implementation of BMPs can in some  
16 situations be more quickly/easily completed  
17 in these areas. A large part of that is due to  
18 the capacity of the private land owners to  
19 select and apply BMPs rapidly as well as the  
20 availability of technical and financial  
21 assistance above and beyond that which  
22 might not be available to a federal agency like  
23 the BLM. A large part of this “critical” area  
24 is outside of the impairment, but selection  
25 and application of BMPs within this area  
26 could have a substantial positive benefit to  
27 those impaired areas downstream.

28  
29 Lower “Critical” Area

30 The second critical area where  
31 implementation of BMPs could most  
32 effectively address the impairment on the  
33 Little Sandy lies downstream on a large area close to the point known as “Below Willow Enclosure”.  
34 This area is considered critical for several reasons. Unlike the upper section of the impairment and  
35 its contributing area, incision is already complete in this section of the watershed and the stream is  
36 working to widen itself and create a new lower stable pattern and profile. Within this section  
37 aggradation is prominent in the channel. Stream banks here are slumping and eroding, but rather  
38 than cutting down, there is movement from side to side as tall banks erode and fall inwards. Flood  
39 plain detachment is complete here, and the stream will continue to erode and  
40  
41 widen until it creates a new geometry at its new base level. In order to return the stream to a  
42 condition where it is meeting all of its beneficial uses it will likely be necessary to reattach the system  
43 to its previous floodplain, or to accelerate the process of developing newer stable geometry at this  
44 lower base level.

45  
46 Like the first “critical area”, the second is also important as it also consists of primarily private and  
47 state land. The management and implementation efforts on these lands are likely to be more  
48 efficient and effective due to the ownership. As with the first critical area example above, EPA 319

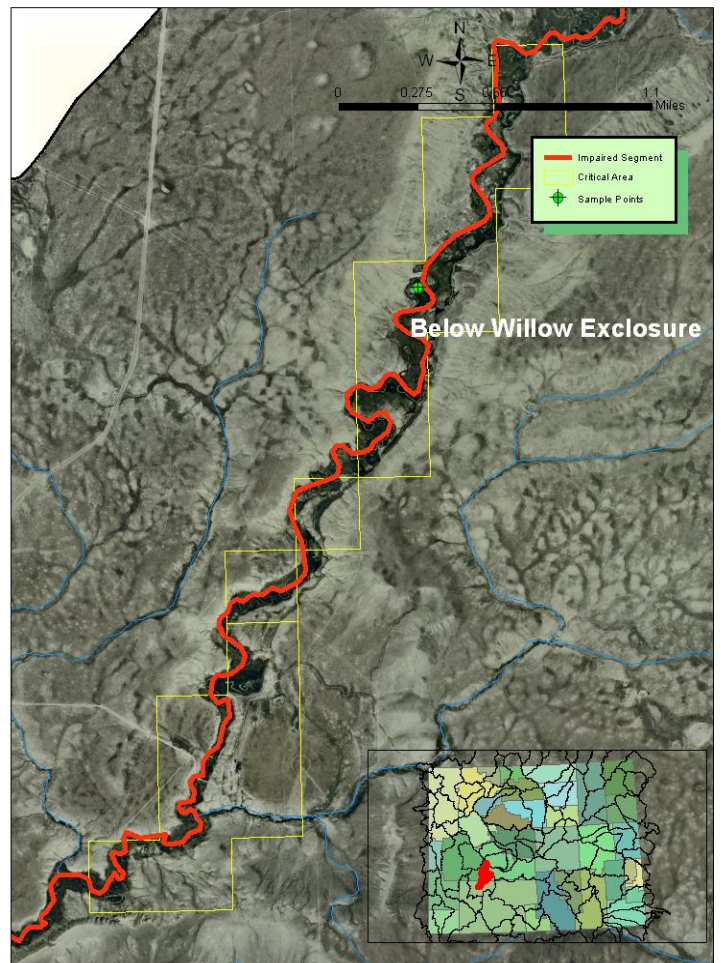


Figure 6 – Lower “Critical” section of the Little Sandy

1 programs, USDA NRCS costs share programs, state financial assistance programs, local  
2 government, and private resources are much more easily brought to bear for implementation efforts  
3 on these lands. It is for these reasons, not just location, that these are seen as “critical” in  
4 developing and implementation strategy to address the impairment.

5 Contributing Watershed “Critical” Area

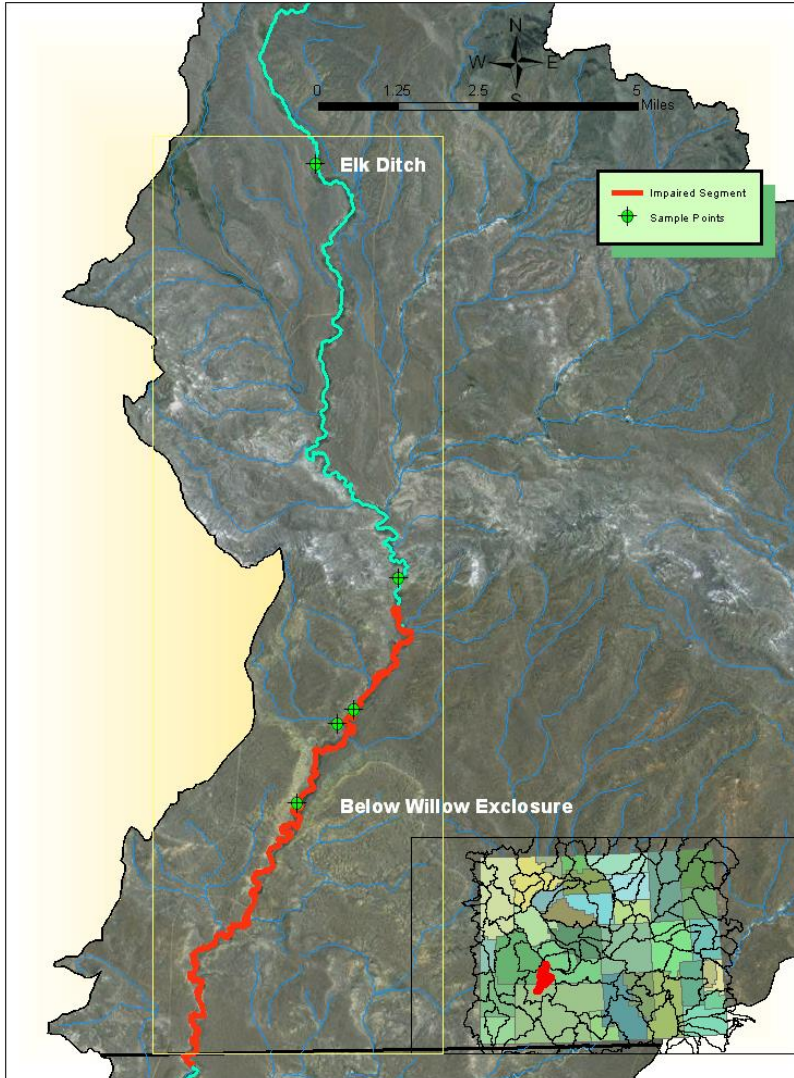


Figure 7 – Contributing Watershed “Critical” area, a primarily non-structural BMP implementation zone.

The third, “Critical” area is best identified as the entire watershed area that contributes to the impaired segments of the Little Sandy, but in areas where stream work is not possible, or where off stream or non-structural practices can most effectively be used to reduce impacts on riparian areas. This critical zone is related to the first two, and may even overlaps, but in general the management of these areas is necessary regardless of any stream restoration options that are pursued. As noted previously in this document, the management on this zone has been considered and revised over time, and is currently considered to be positive by the federal and state management agencies and the WDEQ. Range conditions and riparian trends are positive in the watershed. The WDEQ and NRCS state water quality professionals noted the positive trends in the watershed, and viewed

39

40 continued management of the resources in this positive manner as important. SCCD consultation  
41 with Dr. Dave Rosgen verified that the current management practices had little negative effect on  
42 the current impaired segment of Little Sandy (Rosgen, 2011). Further discussion with Dr. Rosgen  
43 by the SCCD indicated that over extended time periods under current management paradigms  
44 (estimated from 50 to 100 years) the Little Sandy would likely develop a new stable condition where  
45 it would most probably meet its designated uses. However, if it is deemed necessary to return the  
46 stream to a stable condition rapidly, more activities would be necessary. A conceptual restoration  
47 plan developed by professional environmental consultants took place in the fall of 2016. (Appendix  
48 C),

1  
2 This final critical area would best be served by addressing land management with different suites of  
3 BMPs than those that might be more effective in the first two. In this area practices that reduce  
4 riparian pressure and increase wildlife and livestock distribution are likely to be most beneficial and  
5 cost effective. As with other critical areas, these practices should be selected by the local land  
6 owners/managers based on their needs in consultation with resource professionals. It is recognized  
7 that there is no “one size fits all” solution in these cases, but BMPs such as off-site water, access  
8 controls, and grazing strategies are likely to be most effective in terms of both cost and results.

### 9 ***3.H. Prioritization of Sources***

10 Fully prioritizing the different implementation alternatives on the whole of the Little Sandy will  
11 require awaiting the results of any survey and engineering work that is performed as part of detailed  
12 implementation planning on the little Sandy. However, based on the discussion above, as well as the  
13 issues and concerns that are outlined below this section, generalizations can be made on the  
14 hypothetical direction of implementation with the understanding that as financial resources technical  
15 resources fluctuate, implementation strategies may change as well.

16  
17 The primary source of excess sediment is the stream action itself, down-cutting, incising, and seeking  
18 a stable geometry as a result of some historic channel disturbing event or events. The prioritization  
19 should then start with correcting these issues, then move to a management paradigm that maintains  
20 a stable condition.

21  
22 Primary activities in this section would include stabilization of the stream banks.

23 The second area of prioritization should be stabilization of channels banks and channels within the  
24 impaired section.

25  
26 Following the physical stabilization or reconstruction of critical stream segments, riparian area  
27 vegetation and management will become critical components of a management strategy.

28  
29 The final level of prioritization should go to increasing the capacity to manage uplands for better  
30 utilization and animal distribution. These upland areas contribute little in the way of sediment to the  
31 impairment. However, increasing water availability in the uplands, as well the distribution of  
32 livestock and wildlife as a result, decreases the pressure on riparian zones and water sources.

## 33 **4. Issues and Concerns**

### 34 35 ***4.A. Accurate Watershed Characterization***

36 One of the greatest concerns facing the watershed steering group and those landowners who are  
37 working on resource conservation in the area is the dissimilarity of the watershed to those areas  
38 commonly used as references for determining the state of the resource. In many cases, watersheds  
39 can be compared against another in paired studies. This cannot be done on the Little Sandy River  
40 due to the unique nature of its geography, geology, and the limited amount of data on the stream’s  
41 erosion over long periods of time. Determining “acceptable” rates of erosion and more importantly,  
42 understanding the dynamics of the system in order to understand the landscape level result of such  
43 erosion is therefore difficult.

44

1 In order to compensate for the lack of a comparable analog, WDEQ set up studies on the river  
2 using a nested watershed method, monitoring the changes that occurred in upper sections and lower  
3 sections of the stream relative to one another. The steering committee recognizes the limitations of  
4 this approach, and that it still leaves questions related to how the stream should “naturally” be  
5 functioning. Geology, climate, topography, vegetation, land use, and time all play significant roles in  
6 the shaping of the stream, and therefore the committee recognizes that there are limitations to what  
7 the stream can be. Limitations due to these factors, as well as financial constraints that make it  
8 economically impractical to implement some engineering and management activities will ultimately  
9 shape the planning and implementation on this stream.

#### 10 11 ***4.B. Benthic Sampling Obstacles***

12 Most benthic sampling for macroinvertebrates in Wyoming is based in areas with stream substrates  
13 that vary significantly from that found on the Little Sandy. In most benthic sampling, rocks and  
14 gravel in the stream are “scrubbed” and the associated macroinvertebrate community harvested and  
15 quantified. The resulting numbers can then be interpreted using a matrix developed from a  
16 “reference stream”. In order to make a determination on the Little Sandy, the WDEQ used streams  
17 as reference that do not mimic the “natural” analog for the Little Sandy. As previously noted, no  
18 suitable reference has been identified for this stream. In addition, the sandy substrate makes the  
19 stream a poor location for the collection of data in the manner described above. Other methods  
20 exist for the study of a system such as this one; however, those methods have not yet been  
21 incorporated into WDEQ methodologies.

#### 22 23 ***4.C. Cold Water and Warm Water Fisheries Transition***

24 The Little Sandy is currently classified as a 2AB fishery, indicating that one of its beneficial uses is  
25 the protection of cold water fish, such as salmonids. However, the Wyoming Game and Fish, as  
26 previously noted in the WDEQ study, have expressed a desire to maintain and protect the habitat of  
27 the stream for certain cool/warm water species. It is important to recognize that the cool/warm  
28 water species in question can in fact inhabit colder waters, but cannot complete their life history in  
29 the colder waters of the transition zone. It may be appropriate to take a look at the designation of  
30 the stream and reevaluate as to what the appropriate classification may be.

31  
32 Changing the classification of the Little Sandy to a “warm water” fishery would be significant in  
33 several chemical respects. The difference specifically would be the criteria for temperature,  
34 dissolved oxygen, and acute ammonia. These changes would not affect the current listing of the  
35 stream as impaired or not impaired, but might have significance on future data collection and  
36 management decisions on the stream.

#### 37 38 ***4.D. Wildlife & Fisheries***

39 Wildlife habitat and management have been important aspects over time within the watershed, and  
40 land owners as well as federal managers have recognized the difficulty in controlling these  
41 components of the ecosystem. The effective and timely management of wildlife will have a  
42 significant impact on the overall watershed. The steering committee and local conservation district  
43 recognize that good management decisions are based on accurate local knowledge.

#### 44 45 ***Beaver Impacts***

46 One of the key species affecting the hydrology of the watershed is the Beaver. Beavers have been  
47 present in and around the watershed throughout recorded history. The presence and/or absence of  
48 beaver dams as well as the number of dams in a system can have profound effects on hydrology.

1 Beaver dams increase the water table in areas near where they are built and can have positive effects  
2 on the capture of sediment and widening riparian zones near them. Beavers can also have some  
3 negative effects by destroying woody vegetation needed to stabilize stream banks, or in areas where  
4 dam blowouts can cause increased erosion or aggradation downstream. Beaver are present within  
5 the impaired segment.

### 6 7 Big Game

8 The numbers of big game animals in the watershed are significant in many ways. As noted  
9 previously in this document, grazing associated with big game has an impact on the overall  
10 vegetation in the watershed, as well as on the riparian areas specifically. Because the watershed  
11 serves as an area where big game such as elk, deer, moose, and antelope winter; there is significant  
12 pressure on vegetation other than grasses. Plants most affected by winter browsing in riparian areas  
13 include willows (*Salix spp.*), rose (*Rosa spp.*), and other small woody vegetation critical to the stability  
14 of stream banks. Uplands perform a critical function in providing alternative browse and the health  
15 of upland shrubs and communities are therefore important components in determining riparian  
16 pressures and watershed health as well. In watersheds like the Little Sandy, riparian plants are likely  
17 to be preferentially browsed in most conditions. Wildlife grazing occurs on any plants not covered  
18 by snow. This is particularly of concern because unlike livestock, these pressures cannot be changed  
19 through changes in grazing management, rotation, etc. Changes in upland grazing and livestock  
20 management will have little effect on stream sediment in cases such as this if riparian woody  
21 vegetation cannot be established to aid in bank stability. SCCD staff has observed some browsing  
22 patterns, noting heavy browsing on shrubby cinquefoil (*Dasiphora fruticosa*) and rose and light to  
23 moderate utilization on willow species, which can often be species dependent (SCCD, 2011). It is  
24 important to note that these use patterns can change significantly based on the severity of winter  
25 conditions. In addition to providing a preferential food source, these areas also serve as shelter for  
26 both hiding cover and thermal cover. Accurate wildlife counts and appropriate changes in herd  
27 management will be of key importance in developing a strategy for the increase of woody plants for  
28 stabilization of stream banks over time.

### 29 30 Loss of Unique "Sand Dominated System"

31 The Little Sandy is a system that differs greatly from many streams in the mountain west. The sand  
32 dominated system has unique habitat features that are important for species. High banks, for  
33 example, make up an important habitat feature for animals such as cavity nesting songbirds, pygmy  
34 rabbits, etc. Likewise, certain fish species depend on the sandy substrates and unique habitat that  
35 the stream provides. The steering committee feels strongly that it is important that any changes and  
36 implementation maintain the integrity of the watershed as a unique sand dominant system.

### 37 38 Potential Endangered Species Concerns

39 The WDEQ/WGFD has noted the presence of two species of native suckers, identified as species  
40 of greatest conservation need in the State Wildlife Action Plan, within the Little Sandy.  
41 Flannelmouth suckers and bluehead suckers have evolved to occupy the mainstem and tributaries of  
42 large rivers in the Colorado River drainage. Historically flannelmouth suckers and bluehead suckers  
43 would have been common throughout the Green River drainage, including the Little Sandy drainage  
44 downstream of the cold water habitats that supports trout. Streams that support these native  
45 suckers are becoming less prevalent, as a result of competition with non-native fish species,  
46 hybridization with non-native suckers and the effects of water development and reservoir  
47 construction exacerbated by drought have cut off this species' migratory corridors, degraded its  
48 habitat, and encouraged the spread of non-natives. The potential for a listing on any of these types

1 of native fishes as endangered is a concern. The steering committee feels that one of the primary  
2 focuses of planning and implementation should be maintaining this as a fishery to support these  
3 native suckers.

4  
5 In studies of the Little Sandy, concerns were expressed by WDEQ and WGFD that aggradation of  
6 sediments might lead to covering of riffles considered spawning habitat for these native fishes.  
7 Natural resource professionals and landowners on the stream have expressed concern on the  
8 relevance of that question. Little is known about the potential of the stream to support gravel beds,  
9 due primarily to a general lack of gravels in the system. In addition, the system itself might not  
10 provide ideal habitat due to the transitional nature of the temperature (cold water/warm water)  
11 coupled with a capacity to build gravel beds that simply might not be possible. The system  
12 undergoes a significant change from the upper to lower sections; where the substrates and  
13 temperatures transition across a continuum of variability. The ability of this segment of the Little  
14 Sandy River to support fisheries will continue to be evaluated as restoration is pursued and more is  
15 understood about the ability of the system to support gravel beds.

#### 16 17 ***4.E. Livestock Grazing & Management***

18 Livestock grazing in the Little Sandy watershed is arguably the most studied and managed of any of  
19 the land use activities present in the system. Over time, a great deal of study and effort has gone  
20 into studying the interaction of livestock and the other resources in the watershed. Over time the  
21 effects of grazing on uplands, riparian areas, and stream banks has been qualitatively and  
22 quantitatively monitored and changed to implement the proper degree of use, and the time and  
23 intensity of livestock grazing. As time has progressed, management objectives have changed, and  
24 more has become known about the science of natural resource management. The grazing systems  
25 have likewise evolved in order to maintain the quality of the watershed and its productivity.

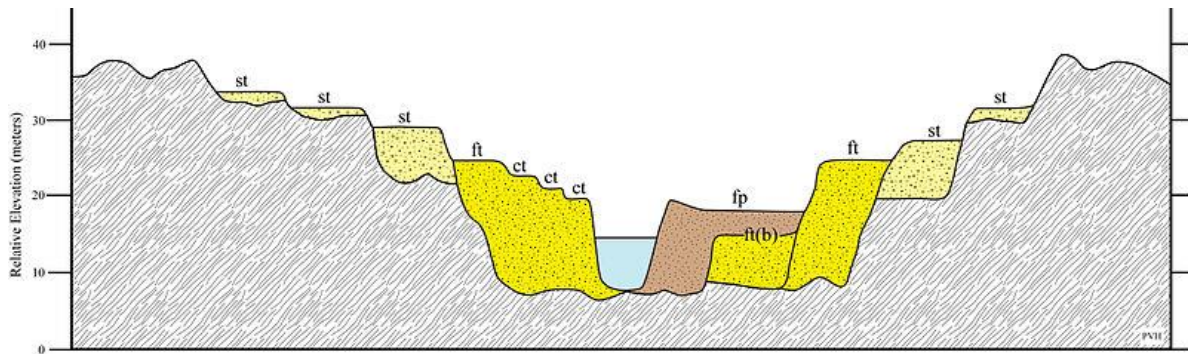
26  
27 Based on the 2004-2008 WDEQ assessment, grazing and historic habitat/channel modifications  
28 were identified as contributing factors to stream bank instability. However, this assessment also  
29 indicated variable reductions in sediment contributions from accelerated stream bank erosion during  
30 the period of assessment took place. The WDEQ concluded that the current grazing system might  
31 be promoting the Little Sandy towards stability (i.e. reducing sediment loads). Based on the available  
32 information at the time, the WDEQ in 2010 proposed a conditional alternative approach to  
33 postpone a 303(d) impairment listing decision for two cycles that was dependent on the BLM and  
34 Grazing Association demonstrating that in fact the current grazing management was continuing to  
35 reduce bank erosion. If continuing reductions in bank erosion were demonstrated, then the Little  
36 Sandy River would be put into Category 4B in the 305(b)/303(d) Integrated Report. Category 4B  
37 indicates that a management plan is in place to address a surface water impairment, but does not  
38 indicate that all designated uses are supported. If continued reductions in stream bank erosion were  
39 not demonstrated, then the impaired segment of the Little Sandy River would be put into Category 5  
40 (303(d) list).

41  
42 Several years following the WDEQ assessment, Dr. Rosgen concluded during his 2011 field visit  
43 that the stream could stabilize within several decades assuming that the current grazing management  
44 was maintained; however, grazing management alone would not accelerate channel stability recovery  
45 within a shorter time frame. He indicated that the Little Sandy River was likely more unstable than  
46 it was during the WDEQ assessment years. This was not a negative reflection on the current  
47 grazing practices, but rather emphasized that the stream was continuing to adjust from historical

1 legacy impacts. This may have been exacerbated by the record high flows that occurred in  
2 2010/2011.

3  
4 Based on these conclusions from a nationally recognized professional hydrologist, the WDEQ felt  
5 that the conditional alternative approach originally proposed was no longer defensible. While  
6 grazing management was still an important component to overall watershed stability, in-stream  
7 channel erosion due to the stream adjusting from historical legacy impacts had taken the dominant  
8 role in the conditions of the channel. Thus, the Little Sandy River was placed on the 303(d) list in  
9 2012.

10



11

12 *Hypothetical valley cross-section illustrating a complex sequence of aggradational (fill) and degradational (cut and strath) terraces.*  
13 *Note ct = cut terrace, ft = fill terrace, ft(b) = buried fill terrace, fp = active floodplain, and st = strath terrace - Paul V.*  
14 *Heinrich*

15

16 Continued proper grazing management will play an important role in restoring the waterbody to  
17 meeting all of its designated uses. However, livestock grazing is clearly the most easily controlled  
18 land use in the watershed, which often leads to it being identified as the sole surrogate for other  
19 problems that may be unrelated.

20

### 21 Wildlife and Stock Water Availability

22 In the Little Sandy watershed, as elsewhere in the arid west, the presence or absence of water  
23 ultimately determines the level of use by wildlife, livestock, and to an extent, humans. One of the  
24 critical positive effects that ranching has had on the watershed is the development of water  
25 resources. These resources in the form of springs, diversions, wells, reservoirs, tanks, etc., have  
26 allowed for the dispersion of wildlife, livestock, and other uses. As animals move to other watering  
27 locations, riparian zones and streams like the Little Sandy receive less pressure. Forage can be  
28 accessed by animals that no longer need to return to the stream for water. Reducing trailing and  
29 energy consumption, reduced erosion, and increased utilization of previously unavailable forage are  
30 positive aspects to both livestock and wildlife. Although there are limited water developments, off  
31 site water availability could be greatly expanded in the watershed. Much of the development  
32 opportunity lies on federal lands, requiring the coordination of federal partners in order to make  
33 these environmental improvements.

34

### 35 Fencing

36 Fencing is a management tool with both positive and negative impacts. Fencing allows managers to  
37 more closely monitor and control the movement, access, and timing of certain grazing events in the  
38 watershed. When developed correctly, these tools can have minimal negative impacts that are  
39 certainly outweighed by the positive attributes that they provide. Although fencing can be useful, it

1 is also a tool with limitations. In the watershed, concerns about the Oregon Trail and its' viewshed  
2 have made it difficult to consider implementing fencing alternatives in some locations where it might  
3 be beneficial and effective to do so. In other areas, especially those that are not maintained by a  
4 private individual, fencing maintenance and effectiveness can be compromised by poor design or  
5 lack of upkeep.

#### 6 7 **4.F. Private Lands**

8 As with a large part of the west, this watershed has a significant component of federal ownership.  
9 This factor can have a negative effect on the capacity of a concerned group or local government to  
10 effect meaningful change. The management of federal lands can be hampered due to a lack of  
11 resources, either human or capital, that enable the agencies address permittee interests in a timely  
12 manner. Federal guidance and policy on land management can be daunting. There is also the  
13 inherent complexity of decision making for federal managers who may have limited local knowledge  
14 in comparison to landowners who have lived and worked in an area for a greater amount of time. In  
15 every case, it has been demonstrated that decision making by individuals at a local level with  
16 increased knowledge lends itself to better long term management of the resources. It is not  
17 surprising then that the vast majority of conservation activities are carried out either on private  
18 lands, or by private individuals with some type of lease on public lands.

19  
20 Management prescriptions on most impaired waters target private landowners. These individuals  
21 are typically more flexible and motivated to implement positive change. The general public and  
22 members of the regulatory community can lose sight of the fact that participation required to  
23 implement change is largely voluntarily. In most cases of conservation implementation the public  
24 goods, better air, land and water quality, are largely paid for by the private individuals who own and  
25 manage land. Public land users then benefit from these activities when downstream water quality is  
26 improved.

27  
28 The landownership on the Little Sandy is likewise similar to other arid areas of the western United  
29 States. The Homestead Act of 1862 was passed by the U.S. Congress. It provided for the transfer of  
30 160 acres of unoccupied public land to each homesteader on payment of a nominal fee after five  
31 years of residence; land could also be acquired after six months of residence at \$1.25 an acre. The  
32 act required that the land be put to beneficial use. The amount of land that could actually be  
33 claimed varied based on a few parameters, but in general, land that could be put to a beneficial  
34 agricultural use was homesteaded and became private property. One of the primary limiting factors  
35 was the availability of water. Because of this fact, most of the lands in the west that have significant  
36 running water were at some point homesteaded and still remain private property today. Those lands  
37 that did not have attributes that would make them useful to settlers remained the property of the  
38 federal government and eventually came under the control of the BLM. For this reason the majority  
39 of the riparian lands on the Little Sandy and other watersheds in the west remain private holdings.

40  
41 One of the difficulties in developing planning to address conservation is the proper allocation of  
42 economic resources to improve the natural resource. Gains in water quality for example, can be  
43 relatively insignificant, or even impossible to quantify at the level of practical monitoring employed.  
44 A question must be asked as to whether this given activity is a valid way to spend private dollars or  
45 taxpayer funding. Ultimately, the decision on the prioritization of implementing any given  
46 conservation practice should be made by the individual landowner. As decision makers become  
47 more removed from the ground level, they typically have less understanding of the issues and



1 concerns and less capacity to accurately detail all of the variables that go into these decisions that are  
2 inherently geographic in nature.

#### 3 4 **4.G. Federal Policy and Decision Making**

5 Within the past, the BLM and Forest Service have dedicated significant resources on developing  
6 partnerships and planning within the watershed. Examples of cooperative historical projects such as  
7 fencing and water development are prevalent throughout federal lands, and examples are found in  
8 the Little Sandy watershed. The fiscal and human resources applied to the development of projects  
9 to improve the resources on federal lands have benefited multiple uses. . The BLM and Forest  
10 Service have statutory requirements related to Federal Environmental Policy Acts that must be met  
11 by the agencies. The compliance with the requirements of these acts can be time consuming.  
12 Where technical resources are scarce or unavailable for the completion of the necessary assessments  
13 land management activities may be difficult to implement or maintain. Examples of these positive  
14 practices include springs development, small reservoirs, other water enhancements, necessary  
15 fencing, etc.

16  
17 The lack of familiarity with Federal policies can be a serious impediment to local land owners who  
18 would otherwise work with the agencies on projects. It can be difficult for the agencies to maintain  
19 local knowledge as personnel move. Federal agencies also face challenges in moving at a pace that is  
20 compatible with the needs and business decisions of their private partners. However, the biggest  
21 impediment for the agencies is a lack of dedicated resources for implementation within the agencies.

22  
23 Because of the difficulties faced by federal agencies, development of beneficial conservation  
24 practices, as well as expense and maintenance, often falls to private individuals such as grazing  
25 permittees. More often than not, these activities are developed on private lands at the land owner's  
26 expense with the benefits "carrying over" to the federal lands.

#### 27 28 **4.H. Private Water Rights and Effects on Flow**

29 By design, Wyoming water law maintains a separation of water quality and water quantity regulation  
30 in different divisions of the state government. Although separated by statute, water quality and  
31 quantity can have significant links in practical applications. Upstream water rights can have an effect  
32 on the amount and timeliness of flow in a stream, which is the case on the Little Sandy. Irrigation  
33 diversions exist upstream of the impaired stream segment. In such diversions, water can be  
34 removed from the system for use elsewhere, and in some cases, added to the system for transport.  
35 Decreases in flow invariably reduce the stream energy present in the system. The net result is a loss  
36 of capacity for a stream to carry a sediment load through the system, thus leading to aggradation.  
37 Increased flows can be equally dynamic, causing marked increases in erosion and scouring.

38  
39 The effects of water quantity issues can have a significant impact on the system. As mentioned in  
40 other areas of this document, the ability of the stream to move sediment and to establish a "stable"  
41 condition is highly dependent on a number of factors. The actual flow is certainly one of these. In  
42 development of this plan, the steering committee recognizes that water quantity issues are not under  
43 the jurisdiction of the WDEQ and that the rights of water users should not be affected by any of the  
44 developments in this plan.

#### 45 46 **4.I. Stream Geomorphology**

47 Streams are inherently dynamic, changing over time. The ultimate goal of stream work is to manage  
48 that change in a way that minimizes what one might consider a negative impact, and maximizes the

1 ability of the system to quickly correct itself and maintain its' gradient and general sinuosity over  
2 time. The balance of the system is actually always in flux based on the climatic conditions, sediment  
3 and suspended load of the stream, and surrounding terrestrial environmental conditions. The  
4 conceptual restoration plan has been completed; final construction designs would need to be  
5 completed before implementing stream structures. As identified in this plan, a large cost estimate  
6 has been associated with stream restoration for the impaired segment. The steering committee will  
7 need to evaluate feasibility based on possible funding resources.

8  
9 ***4.J. Effects of Large Scale Precipitation Events and General Climate Change***

10 The Little Sandy River and the surrounding watersheds are greatly affected by shifts in climate and  
11 precipitation. In arid environments like this one, vegetation can be relatively sparse. This  
12 vegetation, in conjunction with the soils that develop around it, are largely responsible for absorbing  
13 excess precipitation and distributing it over time through subsurface flow to the streams. Therefore,  
14 in arid environments flashy precipitation events are more quickly transmitted to the stream and  
15 carried out of the watershed. The higher flows result in increased power to erode, and the banks  
16 and soils are more prone to erosion due to the lack of vegetation.

17  
18 Recently within the watershed, snowpack has been at extremely high levels, and the result has been  
19 an increase in the amount of water, and therefore the erosive power of that water on the streambed  
20 and stream banks. This comes in the aftermath of several years of drought that ultimately left the  
21 watershed with less vegetative cover and less prepared to offset the effects of extremely wet years.  
22 In the future it remains to be seen as to whether the recent patterns of drought and high flows will  
23 become the norm and if the watershed will move to a state that will accommodate that variability.

24  
25 The variability of the flows has a significant effect on the flooding within the Little Sandy watershed,  
26 and therefore the dynamics of the stream system. On wet years the floodplain is inundated as was  
27 observed in 2011. In other dry years, the stream fails to run at all. This variability makes it very  
28 difficult to accurately describe the dynamics of the stream system with data that is limited to a small  
29 number of years.

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