



## **The U.S. Shorebird Conservation Partnership**

*Building Collaborative Action for Shorebird Conservation*

Nevada Department of Wildlife Habitat Division  
6980 Sierra Center Parkway, Suite 120  
Reno, Nevada 89511  
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13 December 2021

Dear Madam/Sir,

On behalf of the U.S. Shorebird Conservation Partnership's Council, I am writing to provide comments on the development of a Conceptual Management Plan for the recently transferred Carson Lake Wildlife Management Area (WMA). We encourage the Nevada Department of Wildlife (NDOW) to give the utmost consideration of migratory shorebirds in developing management objectives for the new Carson Lake WMA.

The U.S. Shorebird Conservation Partnership (USSCP) and its Council is a collective of individuals and organizations who are expert in the long-term conservation of Western Hemisphere shorebirds and their habitats. USSCP representatives have extensive experience in shorebird conservation and include federal agencies, state agencies and non-governmental organizations. We work collaboratively to address shorebird conservation issues and propose solutions. Accordingly, we are interested in ensuring that migratory shorebirds are a prominent part of the management plan for Carson Lake WMA.

The importance of Carson Lake to migratory shorebirds was recognized in 1988 with its inclusion in the designation of the Lahontan Valley Wetlands as a Western Hemisphere Shorebird Reserve Network (WHSRN) site of Hemispheric Importance. Surveys conducted by NDOW staff and partners, and recently summarized by Senner and colleagues in 2021, demonstrate the continuing value of Carson Lake, and the greater Lahontan Valley, to migrating shorebirds. Many shorebird species are declining drastically, and Carson Lake provides an essential habitat link for shorebirds as they migrate through the Lahontan Valley, Great Basin and the entire Pacific Flyway.

Under federal law (P.L. 101-618), a condition of the conveyance of Carson Lake and Pasture from the Department of Interior to the State of Nevada stated that the area "shall be managed in a manner consistent with applicable international agreements and designation of the area as a component of the Western Hemisphere Shorebird Reserve Network". As a WHSRN site, landowners agree to make shorebird conservation a priority at the site and to protect and

manage the site for shorebirds. This overarching mandate should guide the development of the Carson Lake WMA plan.

The Carson Lake WMA plan should ensure that the seasonal needs for water by shorebirds are given due consideration, even in times of limited availability. Although waterfowl and waterfowl hunting are important aspects of the allocation considerations, the management plan should reflect broader public interests and the legal mandate to manage Carson Lake consistent with its designation as a WHSRN site. Working with the Truckee-Carson Irrigation District, Stillwater National Wildlife Refuge, Fallon Paiute-Shoshone Indian Reservation, and others to develop an integrated approach to allocation and management of water resources in the Lahontan Valley will best serve birds and other wildlife at Carson Lake and the broader interests of all water stakeholders in the Lahontan Valley.

Closely related to water management is management of vegetation. Dense vegetation encroaching on shallow water or mudflat habitats can limit use by shorebirds, and active management will likely be needed to provide a mosaic of habitats that supports a diversity of wildlife. Several species of shorebirds (e.g., American Avocet, Snowy Plover, Long-billed Curlew) nest around Carson Lake, and their habitat requirements need to be considered. Grazing can be a useful tool to manage vegetation. Because of the change in ownership, wildlife and waterfowl may not be subordinate to the primary purpose of grazing Newlands Project livestock at Carson Lake. The Carson Lake WMA plan should provide details on how grazing management will be compatible with providing upland nesting habitat and wetland habitats for shorebirds.

We believe current restrictions on off-road ATV use and over-night camping are most compatible with managing natural resources in this area and thus restrictions should be maintained. ATVs may be appropriate for management and research purposes, but public access should be limited to vehicles on roadways or dikes. One possible exception might be access for waterfowl hunting for persons with limited mobility, but only in limited, clearly designated areas within waterfowl seasons.

Carson Lake WMA has the potential to provide crucial habitats for migrating and nesting shorebirds for decades to come. We trust the management plan will include adequate and appropriate objectives and strategies for shorebird conservation.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Hickey".

Catherine Hickey, Vice Chair  
U.S. Shorebird Conservation Partnership Council