



August 21, 2017

Marc Jackson
Wells Field Manager
BLM Elko District Office
3900 Idaho Street
Elko, NV 89801

RE: DOI-BLM-NV-E030-2017-0010-EA (Antelope and Triple B Complexes Gather Plan)

Dear Mr. Jackson;

The United States Cattlemen's Association (USCA) and our nationwide membership of cow/calf producers, feedlot operators, backgrounders and livestock haulers, supports the Bureau of Land Management's efforts to comply with the Wild Free-Roaming Horse and Burro Act of 1971 (Act) by removing excess horses from both the Antelope Complex and the Triple B Complex HMAs and areas immediately adjacent to the HMAs.

As stated in the original call for comments, the Bureau of Land Management (BLM) estimates that the wild horse population in both complexes numbers approximately 7,739 as of March 2017, not including new foals born this year. The appropriate management level (AML) for this region is 899-1,678 wild horses, which means that the region is experiencing the effects of a population nearly 7 times over AML.

BLM is obligated by provisions of Sec.1333(a) of the Wild Free Roaming Horse and Burro Act to gather excess horses in order to achieve and maintain a thriving natural ecological balance on public lands and prevent suffering and death resulting from excess numbers. The two complexes in this Environmental Assessment (EA) are among the worst examples of excess horse populations degrading the rangelands. Our members have witnessed firsthand the negative effects these specific populations have had on the surrounding landscape and applaud the BLM's efforts in returning to AML.

Upon further review of the EA, USCA believes that BLM should move forward with the planned action (Alternative A) and establish a higher male to female population. USCA has historically opposed the implantation of fertility control methods, as many methods have proven ineffective as a long-term solution due to their costliness and need for reapplication. Gathering excess horses and removing them from the rangelands is the only sensible solution to an overpopulated HMA.

We'd like to thank you and your team at the Elko field office for compiling this EA. We ask that you move ahead with the planned gather, as it is in the best interest of returning to a thriving ecological balance and addresses the need to sustain healthy rangelands for the benefit of all stakeholders.

Please reach out to USCA's Washington, D.C. office at (202) 546-4064 for any further questions or clarifications.

Sincerely,

A handwritten signature in cursive script that reads "Kenny Graner". The signature is written in black ink and is positioned below the word "Sincerely,".

Kenny Graner
President
United States Cattlemen's Association