

# Feral Horse Essays

Ralph R. Sacrison



July 20, 2013

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This is a current listing of my feral horse and burro essays, and related pieces by others. The majority of mine are 500-word pieces published by the Elko Daily Free Press, Elko, NV. The submittal copies include reading lists, tables and figures as appropriate. Item 1 is a public comment submitted to the BLM. Items 3 and 6 are by M. Pickens and D. Harris, respectively. The works are presented chronologically as appropriate to my developing awareness of issues and facts related to land use, science, and agency fiat.

No.	Date	File Name	Title
1	Sep. 18, 2012	SAM submittal 1.pdf	Public Testimony – Proposed Northeast Nevada Wild Horse Eco-Sanctuary
2	Sep. 21, 2012	Forced all in for SAM.pdf	Taxpayers Forced All-in for Eco-Sanctuary
3	Sep. 26, 2012	M Pickens EDFP 26 Sep 2012.pdf	Madeleine Pickens responds to commentary on eco-sanctuary
4	Sep. 28, 2012	Forced all in redux 0.pdf	Taxpayers Deserve Sanctuary from Financing Sanctuaries – Ms. Pickens, May a Small Businessman Provide a Second Affirmative (Published Oct. 2, 2012)
5	Nov. 18, 2012	Bureau forces taxpayers 0.pdf	Self-serving bureaucracy forces taxpayers to fund studies
6	Dec. 3, 2012	Residents dont want to foot bill.pdf	Residents don't want to foot bill for eco-sanctuary, Dylan Woolf Harris, Elko Daily Free Press.

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Preparation date: July 20, 2013.

## **Public Testimony – Proposed Northeast Nevada Wild Horse Eco-Sanctuary**

Bureau of Land Management  
Elko District  
Wells Field Office  
3900 E. Idaho Street  
Elko, NV 89801

Attn.: Eco-Sanctuary EIS  
[EcoSanctuaryComments@blm.gov](mailto:EcoSanctuaryComments@blm.gov)

### **1. Introduction**

The proposed Northeast Nevada Wild Horse Eco-Sanctuary is bold on a par with the most lucrative bureau-scientific endeavors we have come to know. Essentially, folks who have created wealth by risking money in private industry have discovered they can transfer money without risk from Foggy Bottom. Many agency-favored businesses realize that joining the bureau-scientific complex allows a firm to shift their own private risk onto the taxpayer. That is a loose usage of the term risk, since there is no probability involved. It is a certainty that the taxpayer will bear all costs in these agency-crony-capitalist schemes, whether it be wind farms, solar panels or feral horses. Solyndra is obviously a more dramatic example than what is being proposed for Spruce Mountain, but Spruce Mountain follows the same fascistic crony model.

### **2. Direct Taxpayer Support**

Why could this scheme not be done exclusively by the BLM? Because the taxpayer immediately would see it as the budget vortex it is, sucking funds into unfathomable reaches. Dressing it up as a public-private partnership obscures the reality that the taxpayer will fund everything. As direct payment for managing feral horses, Saving America's Mustangs (SAM) will receive up to \$253,000 from taxpayers.

### **3. Indirect Taxpayer Support**

The indirect payments may dwarf those receipts. There are unstated indirect costs in that as a 501(c)(3), virtually all of SAM's operation will be subsidized by the taxpayer. They will erect forty new miles of fence and then maintain a total of approximately 160 miles. Yes, they will fence in the wild horses. They will erect facilities for eco-tourism, including classrooms,

overnight accommodations, food services, water, sewer, power, and parking lots. The total of these easily may exceed six figures of capital and six figures of operating expenses. Millions in taxpayer payments for SAM efforts may be involved, since SAM is a registered charitable and educational non-profit enterprise.

#### **4. Agency Growth**

The declared proposal requires intensive monitoring and participation by agency personnel. As a rule, ranchers do not need bureaucrats in their operations. But SAM asks for bureau monitoring of the herd, as well as bureau participation in the education of eco-tourists. The same agency which will approve or disapprove the SAM partnership will receive substantial material benefit by approving the conversion from ranching to what will become essentially the care and feeding of bureaucrats.

#### **5. Agency Mandate to Support Food Production Ignored**

One of the original constituent agencies of the BLM was the U.S. Grazing Service. Though multiple use is now their charge, without diligent review of all options food production should never be diminished either by omission or commission of agency action. To date in this matter that review apparently has not been done.

The conversion of the Spruce Mountain allotment from cattle to feral horses will remove range from active production. This can be viewed in terms of the direct loss of food, and also in terms of the commercial value of that food. The relation to general economic activity will be discussed as it may be more common for most of us to think in monetary rather than food production terms. Essentially, with so few of the population involved in agriculture, it makes sense to present that production in financial terms in this document which is intended for a general audience.

#### **6. The Proposal Presents Deceptive Costs**

The narrative which follows references the costs and categories in the accompanying table, developed from the taxpayer and producer perspective.

Using BLM data, the allotment will sustain 909 cattle, and perhaps no more than 505 horses. Some ranchers maintain it cannot sustain that many horses. Using these numbers, with a \$1,000 value for cattle requiring three years to raise to market, the annual economic value produced on

the allotment is \$303,000. From this the rancher pays the agency nearly \$15,000 per year in grazing fees. Additionally, sales taxes approaching \$21,000 are paid to the state and county.

SAM proposes they receive \$500 per feral head in order to manage the herd. That comes to a direct taxpayer cost of \$253,000. As noted above, the proposal declares there will be eco-tourism activities, but does not discuss the costs which will be deducted and carried by the taxpayer. A dude ranch for beautiful people to view feral show-horses may well approach costs which overwhelm the annual quarter of a million to maintain the herd. SAM proposes to pay the County approximately \$10,000 for the retirement of the grazing fees in order to compensate for the loss of food production. Since that amount also can be deducted from SAM's taxes, it really remains a taxpayer liability but is mentioned here as indicative of the deceit involved in the venture.

Removing the \$303,000 value of the cattle from the economy, coupled with the direct burden of nearly \$253,000, results in a total direct annual financial burden of \$556,000. Since these are before the majority of tax deductions for operating this charity, the impending cost to the taxpayer is substantial indeed.

Further to that cost is the prudent consideration of wealth recirculation due to agricultural production. Each dollar of created wealth can reasonably be expected to turn over or multiply five times in the local and larger economy. That is, the initial value of the cattle will go into wages and general commerce which would not have occurred without the creation of that wealth. The economic functions of creating value where it did not exist or adding value to something existing are the essence of growth and vibrancy. These enlarge the pie. Simply transferring wealth does not generate growth since at best there is only a balance between the source and the destination. The pie is no larger, just redistributed.

If a recirculating wealth multiplier of five is considered for the agriculturally productive Spruce Mountain Allotment, there is a total annual economic impact of \$1,515,000. Properly accounting for the conversion to non-productive use then removes that greater wealth from the economy. When coupled with the direct taxpayer support of \$253,000, the total annual burden becomes \$1,768,000.

Again, SAM has graciously offered to pay Elko County \$10,000 per year for eliminating grazing rights. What SAM should be required to pay annually will be no less than \$556,000. When the full deductions for the feral ranch operation are considered, those required payments may reasonably range well beyond \$1,800,000.

Though time has not allowed rigorous comparison and analysis, these numbers may be substantiated by the extensive work done for and by Elko County in 'The Impact of Federal Land Policies on the Economy of Elko County, Nevada,' (Leaming, 2010). In that analysis, it is

brutally apparent that federal bureaucrats wield hundreds of millions of dollars in financial control over the County, let alone the State.

### **7. Taking Requires Making Whole**

In this case of replacement of a private business with a government-selected business, retirement of grazing rights essentially is a taking from the private businesses which held those grazing rights.

Further to that, the federal government and the enviro-glitteratti must be subject to equal treatment under the law. Those takers must make the ranchers whole for the loss of livelihood. They also must make the County and State whole for their loss of economic value from food production on the land.

As noted above, this making whole to Elko County and/or the State cannot be done as transfer payments from any State and/or Federal agency. Transfer payments simply move money among the taxpayer's pockets and do not truly recover the societal economic loss.

The making whole must continue until the land is restored to agricultural production. The federal government does not own the land and has no right to take it out of production. The land is owned by the State of Nevada and the people, and removing it from production brings material harm to the State and the people.

### **8. The BLM is not following the Wild Free-Roaming Horses and Burros Act as Amended**

Like many bureaucracies, the BLM is selectively following the acts to which it is obligated. When it chooses to ignore sections, it does so by omission or commission, as expedient. Perhaps the most significant matter regarding the Spruce Mountain allotment is the refusal to cull the range-wide feral horse herd. By allowing the progressing overpopulation of feral horses, the BLM simply increases its own budgetary and personnel requirements. The penalty to the agency is simply the need to budget more SUVs with light racks and employ more biologists with digital recorders. Fiscal and scientific controls are not a concern for the bureau-scientific complex, whether it be alternative energy or feral horses.

The legal requirement to cull overpopulation (PL 92-195 as amended, Sec. 3b. 2. (c)) is systematically ignored by the agency. The wildlife result is that feral horses are subject to starvation, weakness, illness and disease due to overgrazed range and deteriorated springs, among other effects of overpopulation. The agency views the result as positive in that additional animals require additional financial and personnel resources for program administration.

Alternative to culling, the horses are gathered for holding in stockyard conditions where no semblance of being wild remains. Coincidentally, the proposed eco-sanctuaries would do much

the same, in terms of both fencing and sterilization of the animals in order to render the herds non-reproducing.

The agency advertises adoption programs, but those are substantially under-subscribed. Consequently, the majority of gathered animals are concentrated at holding facilities.

On balance, this selective adherence to the Act has exacerbated poor conditions of both the range and the feral animals. The proposed public-private partnerships to establish eco-sanctuaries essentially do nothing more than perpetuate and increase the size of both the feral horse and personnel herds at taxpayer's significant expense. The range conditions will not improve; the conditions of the feral animals will not improve. Rancher's and other taxpayer's conditions will not improve. Apparently, the conditions of agency employees and their partner contractors will improve substantially.

## **9. Conclusion**

Fundamentally, cattle raising is economically productive and vibrant. The proposed fencing in and sterilizing of feral horses will render them sorrowfully listless. The proposal requires productive citizens to forfeit a portion of or their entire livelihood in order allow SAM to concentrate and sterilize the feral horses, thereby committing a heinous atrocity all in the name of SAM's misdirected eco-tistical guilt. The BLM will support this annual negative economic impact because the agency sees a virtual transfer of additional funds to their control. In reality, the eco-sanctuary proposal is societal loss of food production with the end result of sterile, captive formerly feral show-horses.

As an absolute minimum, SAM must pay the annual \$556,000 to \$1,800,000 to Elko County and the ranchers who have been and will continue to be harmed by SAM's taking of that amount of economic productivity.

Respectfully,

Ralph R. Sacrison

**Preliminary Spruce Allotment Financial Analysis  
Taxpayer and Producer Perspective**

Sept. 18, 2012

<b>Baseline Capacity</b>				
<b>Spruce Allotment</b>				
1	Active AUMS	10,908		
2	Active cattle	909	[1]/12	
3	c/h conversion factor	1.8		cattle per horse, 1.8 is max ratio the BLM considers
4	Active horses	505	[2]/[3]	
<b>Productive Wealth Generation</b>				
<b>Rancher</b>				
5		1,000		value per producing animal
6		3		years to market
7		333	[10] / [11]	annualized value per producing animal
8	<b>Created Wealth</b>	<b>303,000</b>	[2] * [12]	annual economic value from cattle
9		5		Natural/agricultural resource wealth recirculation multiplier
10	<b>Recirculating Wealth</b>	<b>1,515,000</b>	[13] * [14]	Total economic impact of agricultural production from Spruce Allotment
<b>Federal Agencies - recipients</b>				
11			1.35	per AUM
12			12 * [11]	per animal unit year
13	Paid from [8] above		[2] * [12]	14,700 annual fee receipts
<b>Local government - recipients</b>				
14			6.850	sales tax rate
15	Paid from [8] above		[14]/100 * [8]	20,800 sales tax on ranch production
<b>Environmental Capital Transfer - Removal of Spruce Mtn Allotment from Food Production</b>				
<b>SAM</b>				
16	Direct from taxpayer	500		annual fee from taxpayer per feral animal
17	" " "	253,000	[4] * [16]	Direct annual SAM receipts from taxpayer
18	" " "	N/A		Agency-directed sterilization to maintain non-producing herd
19	Payment to Elko County	(10,000)	(2/3) * [13]	Grazing fee accomodation to Elko County
20	Total taxpayer direct	243,000	sum[17... 19]	Total direct costs to taxpayer
21	Indirect/deductions	N/A		<div style="border: 1px solid black; padding: 2px; display: inline-block;">                     N/A = not available                 </div> Educational costs / eco-tourism tours on-site accomodations classroom & instructional seminars Miscellaneous
22	" " "	N/A		
23	" " "	N/A		
24	" " "	N/A		
25	" " "	N/A		
26	" " "	10,000	(2/3) * [13]	
27	Total taxpayer indirect	10,000	sum[21... 26]	Total indirect/deductions
28	<b>Taxpayer support</b>	253,000	[20] + [27]	Total SAM billings/deductions
<b>Financial Impact of removing Spruce Mtn Allotment from Food Production</b>				
29	<b>Direct Financial Burden</b>	<b>556,000</b>	[8] + [28]	Total annual primary cost
30	<b>Recirculation Burden</b>	<b>1,768,000</b>	[10] + [28]	Total annual economic burden (multiplied cost)

The Spruce Allotment has the potential to create \$303,000 per year of direct wealth at the example animal values and age. This provides nearly \$15,000 in federal grazing fees and \$21,000 of sales taxes to state and local government. Applying the wealth recirculation factor of 5 common to primary wealth generation from agriculture, the downstream wealth generation exceeds \$1.5 M.

Removing the direct wealth from the economy, there is a loss of \$303,000. The direct and indirect taxpayer support of \$253,000 must be added to that loss, for a Spruce Mountain Sanctuary annual total direct financial burden of \$556,000. Given the number of unavailable direct and indirect cost estimates, this must be considered a minimum expected burden. The only reduction is a false cost, in the proposed payment from SAM to Elko County of \$10,000. It is accounted here as a payment from SAM to the County, but it also would qualify as a deduction and is an internal transfer or wash.

Since natural resource wealth creation can entail recirculation factors of 5-7, this amount should be considered in the conversion of Spruce Mountain from productive to showcase status. The recirculation burden for the conversion is expected to be nearly \$1.8 million per year.

In conclusion, without factoring in the available educational and charity deductions, the annual economic costs to be borne by Elko County for loss of Spruce Mountain grazing begin at \$556,000 and may extend far beyond \$1,800,000.

## Bibliography

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## **Taxpayers Forced All-in for Eco-Sanctuary**

The proposed Northeast Nevada Wild Horse Eco-Sanctuary is another endeavor where folks who have created wealth by risking money in private industry have discovered that without risk they can transfer money from Washington. Agency-favored businesses realize that joining the bureau-scientific complex allows a firm to shift their own private risk onto the taxpayer. That is a loose usage of the term risk, since there is no probability involved. It is a certainty the taxpayer will bear all costs in these fascistic crony capitalist schemes, whether they be wind farms, solar panels or feral horses.

The eco-tistical sanctuary is presented as a public-private partnership as that terminology obscures the funding reality. As direct payment for managing feral horses, Saving America's Mustangs (SAM) will receive up to \$253,000 from taxpayers.

The indirect payments may dwarf those receipts. As a 501(c)(3), virtually all of SAM's operation will be taxpayer subsidized. They will erect forty new miles of fence and then maintain a total of approximately 160 miles. Yes, they will fence in the wild horses. Additional costs will be to stabilize the herd population by sterilization. Wild, huh?

SAM will erect eco-tourism facilities including classrooms, overnight accommodations, food services, water, sewer, power, and parking lots. Agency and contract personnel will conduct a significant amount of herd monitoring and education. A dude ranch for beautiful people to view feral show-horses may greatly exceed the annual quarter of a million to maintain the herd, yet those costs are not discussed.

Also unmentioned in the proposal is the value of currently productive agriculture. Using BLM data, the allotment will sustain 909 cattle, and perhaps no more than 505 horses. Some ranchers maintain it cannot sustain that many horses. Using these numbers, with a \$1,000 value for cattle requiring three years to raise to market, the annual economic value produced on the allotment is \$303,000. From this the rancher pays the agency nearly \$15,000 per year in grazing fees. Additionally, sales taxes approaching \$21,000 are paid to the state and county.

Removing the \$303,000 value of the cattle from the economy, coupled with the direct burden of nearly \$253,000, results in a total direct annual financial burden of \$556,000. Since these are before the tax deductions mentioned above, the impending cost to the taxpayer is substantial indeed.

To offset that loss, SAM pledges to pay the county about \$10,000 for the loss of grazing fees. No mention that this is an eligible deduction in their general tax filing, so the taxpayer remains on that hook.

The multiplier effect of wealth recirculation indicates the annual negative impact of the SAM wealth redistribution proposal may exceed \$1,800,000. The author's submittal is available ([http://www.blm.gov/nv/st/en/info/newsroom/2012/august/elko\\_blm\\_begins\\_process.html](http://www.blm.gov/nv/st/en/info/newsroom/2012/august/elko_blm_begins_process.html)).

The proposed public-private partnerships to establish eco-sanctuaries essentially do nothing more than fence and sterilize the feral horse and enlarge the personnel herds at taxpayer's significant expense. The range and feral animal conditions will deteriorate. Rancher's and other taxpayer's conditions will deteriorate. Apparently, the conditions of agency employees and their crony contractors will improve substantially.

Respectfully,

Ralph R. Sacrison

September 21, 2012

# Madeleine Pickens responds to commentary on eco-sanctuary

A4

Wednesday  
September 26, 2012

By MADELEINE PICKENS

I am often left to wonder if people do any fact checking at all before they begin their wild tales. Certainly Mr. Sacrison did none of that before he submitted his article "Taxpayers forced all-in for Eco-Sanctuary?"

He begins by saying that all risk is passed on to the taxpayer. "It is a certainty the taxpayer will bear all costs in these fascistic crony capitalist schemes, whether they be wind farms, solar panels or feral horses."

So I guess, as the eco-sanctuary project gets attacked from all sides and after five years of planning, I have no risk for the over \$15 million investment I have made in the project to date?

Mr. Sacrison tells the readers that the government is going to pay a direct payment of \$253,000 to Saving Americas Mustangs, but he fails to make reference to the fact that the government is already paying that much and even more to private ranchers who are required to make *no* investments in their respective projects and provide *no* return to the American taxpayer. And he must have no idea how a 501(C) 3 operates or he would know that nonprofits rely on donations from individuals and corporations.

He has one thing right, though, only partially. SAM will build classrooms and overnight accommodations so that the American people, for the first time, can come and view a magnificent resource that they have owned for many generations, dating back long before mining and ranching got their foothold on the public lands.

Mr. Sacrison rambles on about what he perceives to be the negative economic effect of establishing a wild horse eco-sanctuary over maintaining a cattle grazing operation. His failure to recognize the economic inputs from new jobs, tourists traveling to and from the eco-sanctuary and staying in local lodging, eating in local restaurants, the boon to the State of Nevada from a new tourist destination is a remarkable omission or just plain stupidity.

His contention that the land will somehow suffer is also a gross miscal-

culation. The Spruce ranch had been over-utilized by cattle for many years. It has set idle now for two years and is in the best condition it has been in for decades. The amount of horses that will be allowed on the eco-sanctuary will be determined by the BLM, not some arbitrary number that I or someone with no experience on the ground in this area can pull out of the air.

I have already made significant improvements to the Spruce and Warm Creek ranches, as many visitors this past year have witnessed, and will continue to do so. In the course of that work, I have hired dozens of workers and spent a significant amount of money within Elko County and local communities. If Mr. Sacri-

son was a serious person and his intent was to inform, he would have fact-checked that and soon discovered the obvious truth.

You don't have to read far to know what Mr. Sacrison's agenda is; his first reference to "feral" horses tells you just about all you need to know, but if you read on, his claims continue to fall apart. There is no way that the eco-sanctuary proposal could, as he suggests, cause "ranchers and other taxpayer's conditions to deteriorate." Exactly the opposite is true. The eco-sanctuary will generate more income and more jobs at no increased costs to the taxpayer.

Mr. Sacrison has done no favors to the readers of the Elko Free Press nor anyone interested in the SAM eco-sanctuary proposal with his tawdry, unsubstantiated and highly opinionated article. If there are other interested parties in Elko or other parts of this area and beyond who are interested in the SAM eco-sanctuary project and would like to write or discuss the project from an informed point of view, I invite them to contact me and we will be glad to take you on a tour of the property.

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*Madeleine Pickens is founder of Saving America's Mustangs, which is developing the Mustang Monument Wild Horse Eco-Preserve south of Wells.*

Wednesday, September 26 2012 ELKO DAILY FREE PRESS, ELKO, Nevada

## **Taxpayers Deserve Sanctuary from Financing Sanctuaries**

Ms. Pickens, yes, charitable and educational institutions rely on donations. They also are eligible themselves for substantial deductions, which are transfers of cost to others. The casual observer reasonably expects you have legions of lawyers and academies of accountants who will assure your \$15 Million investment has been or will be covered by waitresses, truckers and teachers, among other taxpayers.

You state the government already pays \$253,000 to private ranchers on the allotment, and they are required to make no investments in their respective projects. That could be either a fantastic falsehood, which through repetition becomes believable, or simply a shattering misunderstanding of federal land management and private ranching. The government does not pay ranchers; ranchers pay grazing fees, pay for land and facility improvements, and bear all risk and operating costs on the allotments.

The allotment herd value estimate of \$303,000 is based on reasonable range productivity. Stating there is no return for the American taxpayer in that agricultural productivity belies profound ignorance of the essence of capitalism, or perhaps studied deceit. If one does not understand the fundamental economic energy from productive capacity, perhaps consider the economic works of Francois Quesnay, Adam Smith, Alexander Hamilton, Ludwig von Mises, Friedrich von Hayek, Milton Friedman, Walter E. Williams, or Thomas Sowell. In this matter, my substantial references are 26 USC 501 and the SAM proposal. Enough said.

The Spruce Mountain Sanctuary immediately eliminates the productive value of the allotment, which also takes it off the tax rolls. Further, the service function of transferring private donations and public tax deductions does not create wealth, it transfers or redistributes wealth. Transferred wealth is not created productively; it either is willingly given or taken by force of taxation from persons who then have less for other needs. The SAM model is fundamentally confiscatory and must rely on external funding because it is not a productive use of the natural resource. There is no dynamic wealth recirculation, rather only temporary parity at best, with wealth redistribution and diminishing returns the bitter end.

The SAM model robs Peter to pay Paul. In this case, Peter is the rancher and taxpayer, and Paul is SAM and the bureaucrats and contractors who will require significant funding to operate the feral dude ranch. Since those animals cannot be sold as productive livestock, SAM requires the quarter of a million or more to function. Again, it can further deduct other costs which are unmet by receipts from its activities.

The SAM model is analogous to halting sales at mines or factories while keeping the operations running as museums. How many museums pay for themselves on receipts alone? SAM eliminates the ability to pay for the operation, yet demands someone else pay for continuing to run the operation. Great industrialists like Carnegie, Ford, and Bell were vibrant philanthropists as historically common among captains of industry. At Spruce Mountain, SAM simply appears to be trolling for taxpayers.

Enough on finances; next time let's address your fencing in and sterilizing the herd.

### **Self-serving bureaucracy forces taxpayers to fund studies**

In an earlier discussion (EDFP, Sept. 25, 2012), I wrote that taxpayers are on the hook for virtually all costs which have been or will be associated with the proposed Wild Horse Eco-Sanctuary at Spruce Mountain south of Wells. The economic analysis at the time addressed a significant amount of the existing and expected costs and gains.

As detailed in that essay, the Saving America's Mustangs foundation stands to gain a significant amount of tax-funded income from their proposal. I did not then discuss the extent to which a private corporation is entwined with the fortune and fate of SAM. As owner of the private lands which will be a portion of the proposed sanctuary, the firm of Tommy LLC may do very nicely by establishing the sanctuary.

Jarringly, what continues to come to light is just how lucrative the bureau-scientific complex is for those who join that dark green segment of the body politic. There is no apparent limit to the revenue. That is, until the spendthrift-induced end of our national potential slams home across the entire system.

The particular case of taxpayer-hobbling discussed here concerns the fact that the proposed sanctuary requires an Environmental Impact Statement under the National Environmental Policy Act (NEPA). The Bureau of Land Management is paying a private contractor for a two-year, six- to seven-figure analysis.

Consider if another private firm, say an energy producer, mining company, or land developer proposed to cease food production valued at \$303,000 per year (with an extended value of \$1,515,000 total annual economic impact) to accommodate their declared best use of land. Would the BLM summarily sanction, at taxpayer's expense, the EIS necessary to convince the BLM of the favorability of the energy, mining, or land development use of the land? I and other taxpayers think not. Those common and un-favored firms would not be allowed to shift their EIS cost to the taxpayer.

What we have here is a private firm whose proposal includes an increase in agency activity. It thus presents the agency a potential benefit. The agency then selects and funds another firm to prepare the EIS. The agency and both favored firms benefit short-term even if the EIS rejects the proposal. Obviously, two gain much greater long-term benefit if the EIS recommends the proposal.

The bureau-scientific complex proscribes both the solutions the taxpayer will fund and the politically correct science which confirms, or anoints, those solutions. The bureau-scientific complex or cabal sustains itself with funding procured administratively through regulations developed by that very cabal. The dismal result being that the taxpayer and honest science are assaulted, then abandoned. The taxpayer loses money, and science loses integrity.

How often does the bureau-scientific complex execute similar deceptive machinations throughout a central planning system? How much longer must we pay - can we pay - obscene amounts for political science which supports political apparatchiks before and above natural science? And just how do the horses benefit from the fencing, castration and sterilization proposed by Saving America's Mustangs?

Respectfully,

Ralph R. Sacrison

Nov. 18, 2012

(Published as Guest Commentary, Elko Daily Free Press, Nov. 20, 2012)

## Background Reading

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# Residents don't want to foot bill for eco-sanctuary

DECEMBER 03, 2012 6:00 AM • BY DYLAN WOOLF HARRIS — [DHARRIS@ELKODAILY.COM](mailto:DHARRIS@ELKODAILY.COM)

ELKO — Certain local residents' concerns weren't assuaged by the Bureau of Land Management's response to why \$872,161 in federal money is paying for a proposed wild horse eco-sanctuary preliminary report.

The federally-owned, privately-managed Northeast Nevada Wild Horse Eco-Sanctuary is to be located 25 miles south of Wells on more than 500,000 acres of public land and about 14,000 acres of private land. The project's next step requires the drafting of an EIS, which will require data to be collected and analyzed, and then drafted into a document.

Recently, naysayers spoke out at a county natural resources advisory committee meeting, asking a local BLM representative why the agency was paying for scoping. Private entities such as gold mines typically pay the scoping costs on public lands projects, said committee chair Ralph Sacrison.

In reality, BLM is responsible for doing the EIS statement, according to BLM Elko District Manager Ken Miller.

"The reason industry usually (pays for) them is because we can't do it in the time needed," he said. Sometimes industry opts to pay for scoping to ensure its completion in the quickest time possible.

But a tax-funded EIS, whether or not it's typical, doesn't change Sacrison's position, who sees this as a systemic problem.

"It's apparently a common practice, which makes me even more annoyed," he said. The idea of a wild horse eco-sanctuary was originally proposed in Washington D.C. by Saving America's Mustang founder Madeleine Pickens. SAM is slated to manage the eco-sanctuary. That is who Sacrison and others believe should foot the EIS bill.

Pickens' proposal piqued the BLM's interest, Miller said. The BLM realized the current management technique of gathering wild horses and placing them in long-term holding in the Midwest wasn't practical nor was leaving horses alone until the range was overpopulated. Soon after, it began soliciting ideas for sanctuaries. The agency received a few proposals; Pickens' was selected.

"(The sanctuary) really is a BLM effort to manage public horses and care for public horses in a unique fashion," Miller said. And, the BLM is responsible for managing the herd.

Sacrison views that as a convenient, but ultimately disingenuous, answer.

“It’s the Bureau of Land Management. Not the Bureau of Horse Management,” he said. “To push it off as a public sector rather than a private sector thing. Well, when it suits the agencies they call it a public sector responsibility.”

“All of the different agencies, when they have a project that they really want, they have the ability themselves to decree that this needs to be funded in the interest of the nation. In a lot of these cases, it’s the taxpayers who are getting gored,” he added.

[http://elkodaily.com/news/residents-don-t-want-to-foot-bill-for-eco-sanctuary/article\\_f7c43bde-3d03-11e2-b592-0019bb2963f4.html](http://elkodaily.com/news/residents-don-t-want-to-foot-bill-for-eco-sanctuary/article_f7c43bde-3d03-11e2-b592-0019bb2963f4.html)