

## Sage Hen Essays



July 1, 2013

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This is a current listing of my sage hen essays. The majority are 500-word pieces published by the Elko Daily Free Press, Elko, NV. The submittal copies include reading lists, tables and figures as appropriate. Items 4 and 5 are public comments submitted to BLM panels. The works are presented chronologically as appropriate to my developing awareness of issues and facts related to land use, science, and agency fiat.

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Preparation date: June 29, 2013

January 10, 2012

### **Sage Grouse and the Bureau – Scientific Complex**

The domestic lumber industry was devastated by policies to protect the Northern Spotted Owl. By 2004, the US Fish & Wildlife Service established that perhaps all along the larger barred owls simply were eating the spotted owls.

Despite implication in the lynx hoax, by which they intended to restrict public access to national forests, federal personnel received bonuses. Bull trout, salmon, and smelt protection campaigns have denied farms water for food production... while the matters are under further study. In 2010, EPA promulgated spill reports for milk, forcing surreal and costly regulations on farmers before public outrage forced the regulation to be rescinded.

Twenty-one Landscape Conservation Cooperatives are being established across the country by the USDI 'to better integrate science and management to address climate change and related issues.' The Great Basin LCC 'will provide to a wide array of managers a range of scientific and technical support tools for landscape-scale conservation design.' The steering committee will consist of twenty-four persons. Nineteen will be government or NGO employees, and five will be private representatives. Apparently those would be the five taxpayers who foot the bill for all the others.

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The preliminary issues being considered to protect sage grouse include habitat management, energy production, hardrock and industrial minerals, rights-of-way, renewable energy, wildfires, invasive weeds, grazing, off-highway vehicles and recreation. Many are the usual suspects as charged in the anti-logging, anti-development campaign to protect the spotted owl.

What part have the central planning agencies played in the decline of sheep ranching? Since they must consume soft-tissue foods, sage grouse used to thrive on sheep droppings. Fewer sage grouse, so apparently the central planners have to restrict mining. Ravens, perhaps the primary predator of sage grouse, are now on the protected species list. The surging raven population is further decimating sage grouse. An evident solution is restrictions on cattle ranching. With the subsequent fuel load buildup, fire years scorching hundreds of thousands of acres are now common. Sage grouse are lost in those infernos. So... restrict off-highway travel and recreation.

Is misplaced blame now an aspect of the scientific method? Recurrently, misplaced blame seems to guide public policy. The progression of sage grouse studies and solutions is troubling because previous central planning suggests the correct actions will not be taken by the bureaucracy.

The politically-correct scientists already have destroyed logging in communities across America. Who is next? Can we expect the bureaucracy to protect sage grouse any differently than the spotted owl? With the nation 16 trillion dollars in debt, will their true impact be to eliminate jobs and ruin communities while protecting the bureaucracy?

President Eisenhower warned us of the military-industrial complex. Perhaps now we should consider a bureau-scientific complex centralizing science and regulating our rights, opportunities, and liberties.

Sincerely,

Ralph R. Sacrison

Note:

This letter ran in the Elko Daily Free Press, Elko, NV on January 12, 2012

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February 24, 2012

### **Bureaucracy needs a diet**

In the ongoing bureaucratic studies of sage grouse it is apparent that centralized policy overrides sound science. Ravens are numerous and are recognized as subsidized predators in large through their ability to adapt to resources made available by human activity. Due to their wide diet and hunting characteristics, they engage in hyperpredation whereby they can remain in an area and continue to hunt declining species while extending their diet to more abundant prey.

The government count indicates there are 88,000 sage grouse in the California/Nevada management area. The government count indicates there may be 952,000 ravens in Nevada alone. Since different agencies are the basis for these numbers, they are never presented in the same documents nor is the value of comparing these populations ever raised by the government.

In sage grouse habitat, raven predation of nests essentially is 100% effective, in that whether one or all eggs are taken, the sage grouse subsequently abandon the nest. With the overwhelming raven population, this assures sage grouse extinction is on the way. Yet the agencies maintain that ranchers, power plants, mines and recreational visitors must be restricted while paying no substantial attention to the actual subsidized predators.

What are the agencies doing to address raven predation? In 2010, the Nevada Department of Wildlife allowed the taking of 1,500 ravens to reduce sage grouse predation. That appears to be less than two tenths of a percent of that subsidized predator population. Out of a legislatively mandated budget of \$600,000 for predation control, \$50,000 were spent on taking these ravens. Fiscal as well as predation control may be an issue.

It also bears noting that one group recommends taste aversion training to discourage ravens from eating sage grouse eggs. Will the bureaucracy consult with Mrs. Obama for insight on the change of diet she hoped for schoolchildren? With a \$16 trillion national debt, the government scientists are recommending diet therapy for the birds.

The agencies consider fire a subordinate factor in sage grouse survival. Grouse loss through elimination of food and shelter is noted in research papers and policy discussion, but immediate deaths from burning and suffocation receive effectively no attention. Independent research and observation indicates direct fire losses may be significant, perhaps on the order of two or three mammals or birds per acre. Nesting loss might well exceed that. From the view of this

businessman and many ranchers, the agencies do not seem to encourage grazing down fuel loads, nor do they assess and report wildlife loss due to wildfires.

The apparent agency refusal to seriously consider predation and fire in the survivability of the sage grouse assures not only the endangered species listing of the sage grouse, but in fact the actual endangerment of the species. Extinction will not be the fault of the rancher nor the hunter nor the industrial worker. Sage grouse extinction will be the fault of the politically-correct scientist and the politically-correct bureaucrat.

Sincerely,

Ralph R. Sacrison



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March 10, 2012

### **Grouching about the scale of mining**

The US Bureau of Land Management and the US Forest Service together manage about 87,500 square miles of sage-grouse habitat. Improving that habitat is a key focus of the agencies' plans to assure the survivability of the bird. Current and proposed regulatory mechanisms include significant restrictions on mining and other development across the region.

These concerns beg the question never quantitatively addressed by the agencies: what is the impact of these developments on the sage grouse habitat? A historic number which comes to mind is 8,844 sq. mi. That is the 1930-1980 cumulative nationwide mined land disturbance reported in the final land use circular issued by the now-closed Bureau of Mines. In fifty years of mining, and mining and beneficiation waste storage, the total amount of land used was slightly more than half the area of Elko County, NV (17,181 sq. mi.), the nation's seventh-largest county. Quarries and mines in the lower 48 now cover 2,584 square miles.

The principal commodities covered in the earlier years were coal, sand & gravel, stone, phosphate, clay, copper and iron ore. In descending order, the states with the most affected land were: PA, KY, OH, IL, WV, FL, IN, CA, AL, MO. 47% of that disturbed land was reclaimed at the end of the reporting period. Subsequent laws and regulations assure concurrent reclamation with all mining.

The fifty year period covers the introduction of walking draglines in coal and phosphate, coal and clay mining across the south, the open pit copper giants of AZ, NM, UT, NV, MT and the great iron pits of the Mesabi Range in MN. It includes all the aggregate pits which built Hoover, Garrison, Grand Coulee and the Tennessee Valley Authority dams. It includes virtually the entire uranium industry, and most of the quarries of the Interstate highway system.

The area comparisons show the essential insignificance of restricting mining in order to save the sage grouse. Habitat management simply fulfills the bureaucratic prime directive, which is growth of the bureaucracy, not growth of the sage grouse population.

The agencies' most desired actions are high-cost, high-personnel endeavors. Those require additional employees, facilities, and fleets. The most effective of these in helping the bird is firefighting. The need for firefighting can be most effectively reduced by allowing ranchers and farmers to go about their business using their own judgment, without agency interference.

Agricultural production historically has supported sage grouse populations by coincidentally providing both food and shelter.

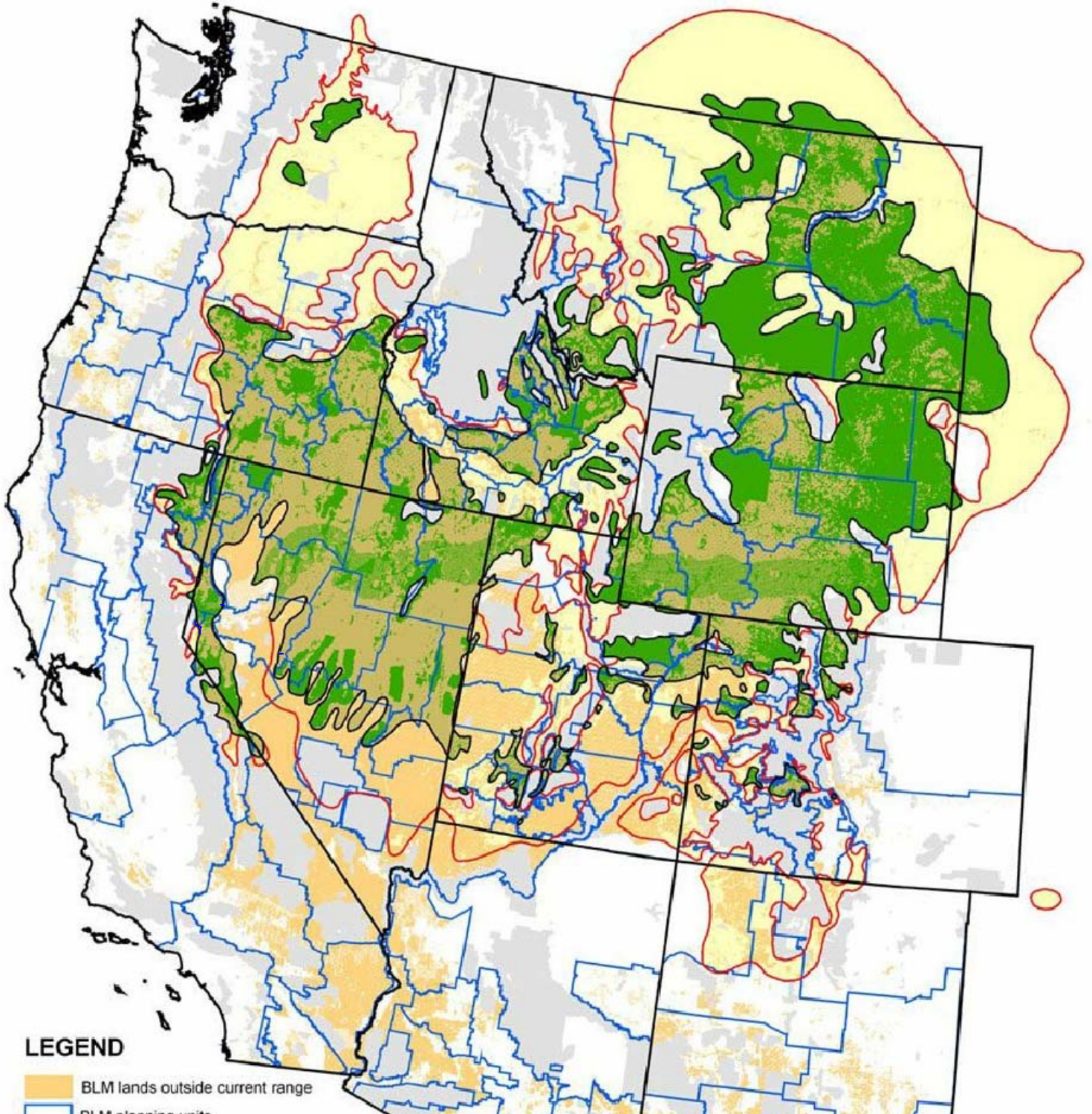
Immediate predator control is essential for the survival of the sage grouse. Agency numbers indicate that in Nevada there are eleven ravens for every sage grouse. Agencies still insist controlling that significant predator is not a priority. That is like putting one lone player on the football field against a full opposing lineup.

The government scientists are telling the lone player not to worry about what will happen after the starting whistle, because the habitat-managing bureaucrats are building the lone player a fine clubhouse.

Sincerely,

Ralph R. Sacrison

# BLM Planning Units and Sage-grouse Occurrence



## LEGEND

- BLM lands outside current range
- BLM planning units
- Other Federal

## Sage-grouse

- current distribution on non-BLM land
- current distribution on BLM land
- probable historic range



Between 1930 and 1980 only 0.25% of the total land area of the United States was used for surface mining and the disposal of wastes from surface mines, underground mines and milling facilities. Coal accounted for about half this amount.

No warranty is made as to the accuracy, reliability or completeness of these data for individual or aggregate use with other data.

Based on data prepared by  
Mike Schroeder, Washington DFW

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March 22, 2012

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## **Public Comment – Western Region Greater Sage-Grouse Planning Strategy**

### **1. Preliminary Discussion**

#### **1.1. Introduction**

The domestic lumber industry was devastated by policies to protect the Northern Spotted Owl. By 2004, the US Fish & Wildlife Service established that perhaps all along, the larger barred owls simply were eating the spotted owls (USFWS, 2004).

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What part have the central planning agencies played in the decline of sheep ranching? Since sage grouse must consume soft-tissue foods, they used to thrive on sheep droppings. Fewer sage grouse, so apparently the central planners have to restrict mining. Ravens, perhaps the primary predator of sage grouse, are now on the protected species list. The surging raven population is further decimating sage grouse. An evident solution is restrictions on cattle ranching. With the subsequent fuel load buildup, fire years scorching hundreds of thousands of acres are now common. Sage grouse are lost in those infernos. So... restrict off-highway travel and recreation.

Is misplaced blame now an aspect of the scientific method? Recurrently, misplaced blame seems to guide public policy. The progression of sage grouse studies and solutions is troubling because previous central planning suggests the correct actions will not be taken by the bureaucracy.

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President Eisenhower warned us of the military-industrial complex. Perhaps now we should consider a bureau-scientific complex centralizing science and regulating our rights, opportunities, and liberties.

## **2. Analysis**

### **2.1. Assessment and Assignment Form Discussion**

It is apparent that centralized policy overrides science when considering the analyses and conclusions of the sage grouse studies. Whether by intent or coincidence, for the uninitiated but scientifically and technically accomplished reader, the submitted May 15, 2011 USFWS Species Assessment and Listing Priority Assignment Form (USFWS 2011, subsequently noted as Form) is unclear and poorly presented. The 139-page submittal is without page numbers, table of contents or index. Headings are repetitive except where they simply reference letters of the alphabet with no clear subject. That unprofessional and unclear construct makes referencing, cross-referencing and checking tedious beyond the point of deceptive.

Given the scale and import of the matter, this is troubling since the presentation obscures both data and analyses, hindering substantive evaluation of the conclusions and recommendations. As a taxpayer, it is appalling that this low quality apparently is standard and acceptable practice by the bureaucracy.

Primarily due to time constraints of the public comment window, the following analyses are of selected topics within the Form.

## **2.2. Population**

On reviewing the Form, the grouse population count data are very instructive. The count, in seven management zones across eleven states, incorporates data from 2002 through 2008. The Form notes new counts were conducted in 2010, but does not report those numbers. Trends are discussed for two pages, with no clear and hard summaries. Preliminary review of many of the referenced articles indicates they are local and do not extend to range-wide conclusions. The lack of standard data impedes everyone's ability to diligently analyze both the data and the conclusions. If the tabulated numbers are to be accepted, approximately 535,000 sage grouse exist across the eleven states. Within the California/Nevada zone, the 2004 count is listed as 88,000.

Significantly, the sage grouse population greatly exceeds the threshold levels required for listing as either an endangered or threatened species. The USFWS has determined a minimum of 5,000 birds can genetically maintain the species (Barr, 2012).

## **2.3. Habitat Conversion for Agriculture**

The preliminary statement in the four pages devoted to this factor, declares that ten percent of historic sagebrush range has been converted to agricultural use since the onset of EuroAmerican settlement. Edge effects entail an additional effective encroachment on sage grouse habitat, but bear tempering by anecdotal evidence of significant sage grouse persistence within active farmland near Ely, Nevada (Carpenter, 2012).

The benefit of the habitat edge is supported with recent studies and discussion indicating the sage grouse have been observed preferentially selecting ecology edges in order to provide cover on one hand and access to food and water on the other (Coates, 2012). Where and when edges can be a threat is in the anthropogenic provision of predation sites. That is further discussed in Section 2.8 below.

## **2.4. Fire**

In the Form, fire appears to be considered a subordinate factor in sage grouse survival (6 pp). Grouse loss through elimination of food and shelter is noted, but immediate deaths from burning and suffocation receive no discussion. Other research and observation indicates immediate fire losses may be significant (Strickler, 2012). From the view of a taxpayer, the agencies apparently do not encourage grazing down fuel loads, nor do they assess wildlife loss due to wildfires.

## **2.5. Mining**

The US Bureau of Land Management and the US Forest Service together manage about 87,500 square miles of sage-grouse habitat. Improving that habitat is a key focus of the agencies' plans



to assure the survivability of the bird. Current and proposed regulatory mechanisms include significant restrictions on mining and other development across the region.

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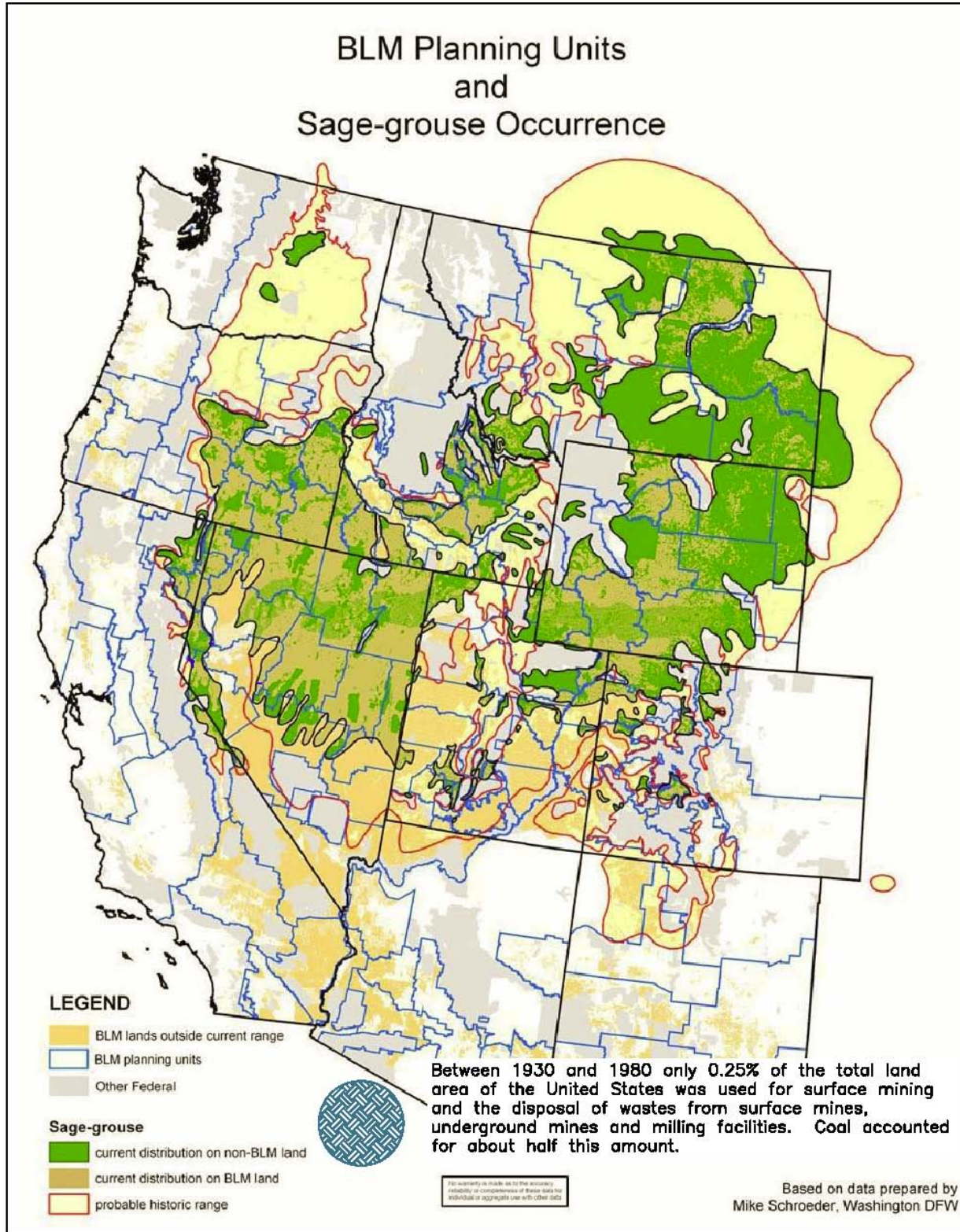
The fifty year period covers the introduction of walking draglines in coal and phosphate, coal and clay mining across the south, the open pit copper giants of AZ, NM, UT, NV, MT and the great iron pits of the Mesabi Range in MN. It includes all the aggregate pits which built Hoover, Garrison, Grand Coulee and the Tennessee Valley Authority dams. It includes virtually the entire uranium industry, and most of the quarries of the Interstate highway system.

For more recent numbers, quarries and mines in the lower 48 now cover 2,584 square miles (USGS, 2010). The Form itself mentions approximately 294 mi<sup>2</sup> of current or planned mining activity within the sage grouse habitat. Though the Form data presentation on mining disturbance is incomplete, the area comparisons show the essential insignificance of restricting mining in order to save the sage grouse. Habitat management simply fulfills the bureaucratic prime directive, which is growth of the bureaucracy, not growth of the sage grouse population.

Figure 1 shows the sage grouse range with a comparative image of the 8,844 sq. mi. fifty-year cumulative mine disturbance.

## **2.6. Climate Change**

Climate change (i.e. increased temperatures) is declared as a given and projected as a significant influence on grouse survivability. There are four pages in the Form explicitly discussing how government scientists are studying this phenomenon on behalf of sage grouse.



**Figure 1. Sage grouse occurrence and 1930-1980 nationwide mined land disturbance**

## **2.7. Grazing**

Grazing receives five pages of summary discussion, much of which seems to stand in contrast to pioneer records, ranchers' histories and current resident witness to sage grouse life cycle, habit and extent. The discussion does not reflect the measured and diligent statement of Nevada Assemblyman Ira Hansen (2011).

One correlation which must be considered is that the relatively high sage grouse population counts from the 1920s through the 1950s were contemporary with extensive grazing of both cattle and sheep (Barr, 2012a, Steninger & Barr, 2012). Additionally, there was concerted predator control encouraged and sanctioned by the government.

## **2.8. Predation**

The effective range-wide predator and sage grouse occurrence intersection is shown in Figure 2. The Form conclusions of minimal effect of predation do not seem to follow from the discussion, especially as regards corvids. It bears noting that one of the references (Bui, et al., 2010) recommends taste aversion training to discourage ravens from eating sage grouse eggs. Will the bureaucracy consult with Mrs. Obama for insight on the change of diet she hoped for schoolchildren? With a \$16 trillion national debt, the bureaucracy is recommending diet therapy for the birds.

Ravens are ranked in the category of Least Concern (IUCN, 2011) as regards susceptibility to extinction. They are recognized as subsidized predators in large through their ability to adapt to resources made available by human activity. Due to their wide diet and hunting characteristics, they engage in hyperpredation whereby they can remain in an area and continue to hunt declining species while extending their diet to more abundant prey. In so doing, they continue to threaten the less numerous species rather than move on and relieve the predation pressure.

With a 15-fold increase of raven population in the last fifty years, the bureaucracy does not consider that active reduction of ravens merits scientific, let alone policy discussion. In the same time frame, the bureaucracy has neither consistently counted nor consistently reported sage grouse populations, yet asks the taxpayer to accept the bureaucratic conclusion that listing is inevitable.

One of the Mojave desert studies reported by Boarman & Coe (2002) indicates 3.35 ravens per square kilometer. Applying that density to the 284,449 square kilometers comprising the state of Nevada suggests there may be 952,000 subsidized predators available to prey on sage grouse.

### BLM Planning Units With Raven and Coyote and Sage-grouse Occurrence

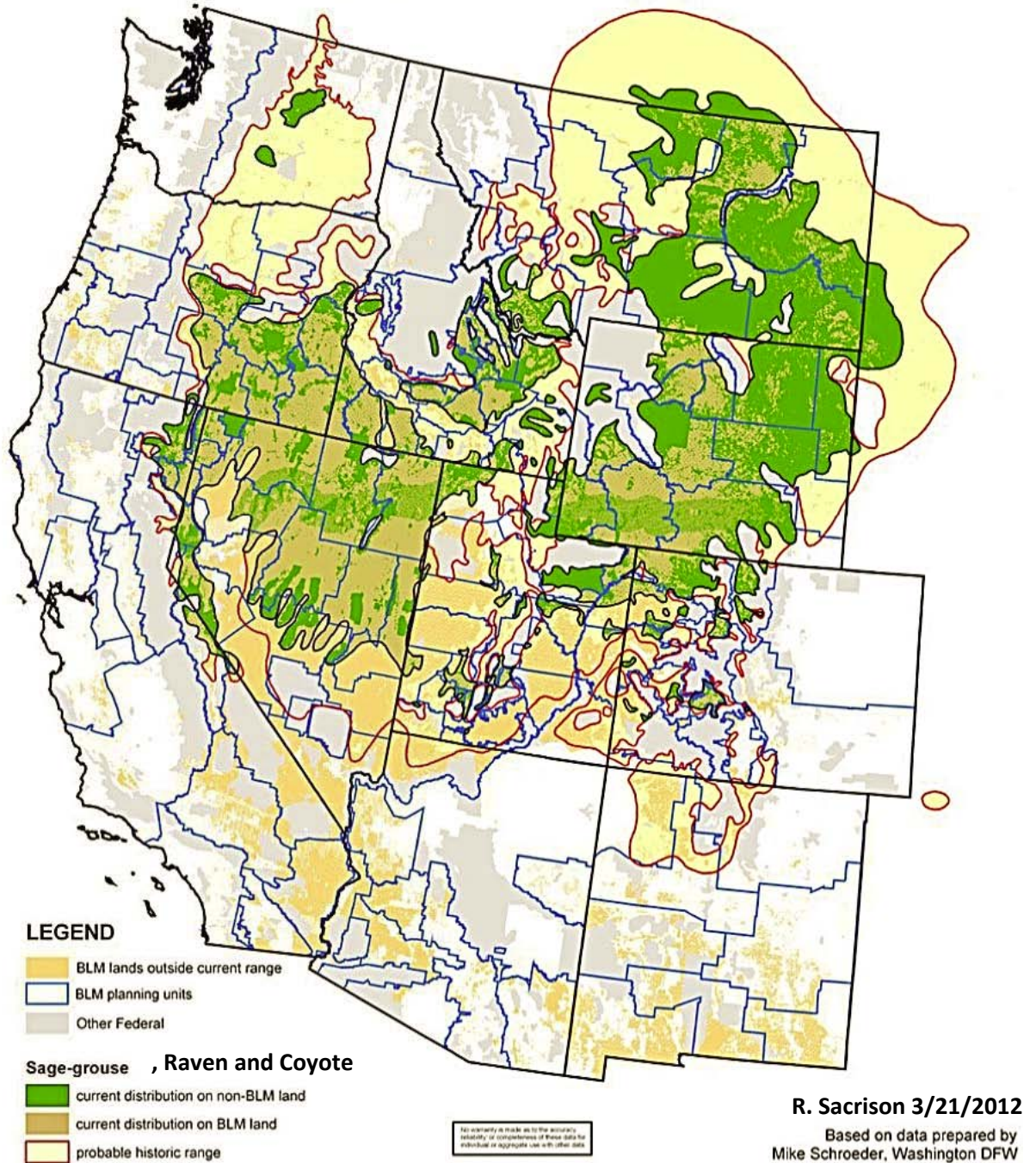


Figure 2. Raven, coyote and sage grouse occurrence

The 2004 sage grouse count for California and Nevada indicated 88,000 birds (Form). Even were all these sage grouse within the boundaries of Nevada, apparently there are nearly eleven ravens for each sage grouse. Since some of those sage grouse are in California, there actually may be more than eleven ravens per grouse within Nevada.

This author recognizes and stresses these numbers must be accepted with care, as they are neither spatially nor temporally consistent. The fact is that readily comparable numbers are difficult to obtain precisely because the agencies consistently gloss over the actual counts of both the subsidized predator and the prey, and they never directly compare the raven and sage grouse populations. Certainly this author's decades of living and working in sage grouse and raven range suggest the eleven-to-one ratio is realistic.

In sage grouse habitat, raven predation of nests essentially is 100% effective, in that whether one or all eggs are taken, the sage grouse subsequently abandon the nest (Bui et al., 2010). With the overwhelming raven population, this assures sage grouse extinction is on the way. Yet the agencies maintain that ranchers, power plants, mines and recreational visitors must be restricted while paying no substantial attention to the actual subsidized predators.

In 2010, NDOW allowed the taking of 1,500 ravens to reduce sage grouse predation. That appears to be less than two tenths of a percent of that subsidized predator population. Out of a legislatively mandated budget of \$600,000 for predation control, \$50,000 were spent on taking these ravens. \$40,000 of the actual expenditure was funding separate from the NDOW predation control budget (NDOW, 2012). Fiscal as well as predation control may be an issue.

The nesting phase of the sage grouse life cycle may be critical in addressing predation. The Form states an average clutch size of seven eggs. Since the grouse completely abandon a depredated nest, the actual kill ration becomes 7:1. That is, there are seven grouse killed for each single predation event, whether the predator eats all the eggs or not. With that kill ratio, suggesting predator control provides no significant benefit to the sage grouse flies in the face of both common sense and decency.

Discussion has been tendered that predation control is ineffective since removed territorial ravens simply are replaced by a higher number of transitory ravens (Coates, 2012). Barr (2012b) points out the following regarding this research:

The predation control studies indicate the territorial ravens, knowing their normal hunting range, are three times as effective at nest depredation as the transitory birds. When the territorial ravens are removed by predation control, the transitory ravens, no longer harassed out, replace the territorial birds at twice the density. The two replacement birds thus hunt at a combined two-thirds the effectiveness of the removed raven. If the territorial raven takes

ninety sage grouse eggs during the nesting cycle, this indicates the two transitory birds will take sixty.

Though all ninety sage grouse will not be saved, thirty will be. There is an immediate benefit in using predator control, despite the government scientist and agency bureaucrat conclusions to the contrary.

The population numbers, hunting effectiveness, and kill ratios allow reasonable planning to immediately benefit the sage grouse. The following may provide a thirty percent sage grouse population growth per year. Additional government personnel will not be required, and the predator control will not interfere with habitat management, locally or range-wide. The plan outlined is most effective if applied throughout the eleven-state sage grouse range, though it will be locally effective and could be initiated sequentially.

- 2.8.1. Establish harvest rates for predators. This can be locally determined based on local conditions and population counts. For instance, using Boarman and Coe (2002) in Nevada the raven:sage grouse rate could be 11:1. Other predators and prey, such as coyotes and pygmy rabbits, would have specific harvest rates for the predators.
- 2.8.2. Establish a bounty. This can be a cash amount or it can be a service credit. The cash could be the expected government hunter cost per harvested bird. The cash bounty would simply be paid for submitted wings. The service credit would be an appropriate hunting license for the commensurate harvest rate. In Nevada, submitting eleven ravens would earn a sage grouse license or stamp.
- 2.8.3. Consider the kill ratios for the life phases of the prey. They may be multipliers to the base harvest rate. For instance, with the sage grouse, the raven kill ratio during the nesting cycle is 7:1. That ratio may be much lower during other phases of the sage grouse life cycle, since subsequent predation events may not kill as many sage grouse in one action.
- 2.8.4. Enact and then monitor predator and prey population levels. Adjust harvest rates as appropriate.

This approach manages the animals, not the people. Significantly, it allows the citizen to be the principal agent in protecting the sage grouse. The current agency policies, as with the unsuccessful spotted owl program, presume government personnel must be intimately involved. Habitat management essentially is a people-management mechanism, and does not directly, certainly does not immediately, help the prey. Habitat management solves the wrong problem at the wrong time.

### **3. Conclusion**

The prime directive of the bureaucracy is growth of the bureaucracy, not growth of the sage grouse population. This is evident since by far the greatest portion of the Form is devoted to

regulatory mechanisms. That extensive discussion reads as a rationalization for greater regulatory expansion. Essentially, it states that central planning by an enlarged bureaucracy will improve habitat by restricting or eliminating human activity on or near sage grouse habitat.

Predation and fires are immediate events. Habitat control and management are long term solutions which cannot immediately protect sage grouse from predation and fires.

By agency policy ravens are now provided subsidized hyperpredation of sage grouse. By agency policy, fire potential cannot be substantially reduced since grazing down fuel loads requires lengthy bureaucratic permission rather than a rancher's immediate seasonal decision.

Predation control through either poisoned bait (eggs) or small bore firearms can be immediately effective. Fire control through free-market grazing decisions of cattlemen or sheep growers can be effective in protecting sage grouse within one climate season. Bureaucratic habitat control will take no less than multiple budget cycles, and personnel reviews, before any agency even begins to be an effective advocate for the benefit of sage grouse.

The agencies' most desired actions are high-cost, high-personnel endeavors. Those require additional employees, facilities, and fleets. The most effective of these in helping the bird is firefighting. The need for firefighting can be most effectively reduced by allowing ranchers and farmers to go about their business using their own judgment, without agency interference. Agricultural production historically has supported sage grouse populations by coincidentally providing both food and shelter.

Immediate predator control is essential for the survival of the sage grouse. Agency numbers indicate that in Nevada there are eleven ravens for every sage grouse. Agencies still insist controlling that significant predator is not a priority. That is like putting one lone player on the football field against a full opposing lineup. The government scientists are telling the lone player not to worry about what will happen after the starting whistle, because the habitat-managing bureaucrats are building the lone player a fine clubhouse.

The apparent agency refusal to seriously consider predation and fire in the survivability of the sage grouse assures not only the endangered species listing of the sage grouse, but in fact the actual endangerment of the species. Extinction will not be the fault of the rancher nor the hunter nor the industrial worker. Sage grouse extinction will be the fault of the politically-correct scientist and the politically-correct bureaucrat.

Sincerely,

Ralph R. Sacrison

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Public Comment Presented to the  
Bureau of Land Management Northeastern Great Basin Resource Advisory Council  
April 19, 2012

**Sage Grouse Selective Management – Budgets over Birds**

**Introduction**

Just as they did with the spotted owl, state and federal agencies are persecuting producers in order to protect the sage grouse. By preventing timber production, the agencies destroyed jobs in building materials, furniture and paper goods – printing stock but also a myriad of filter products. So much for agencies helping the environment. The agencies destroyed industries, devastated communities, displaced people and increased fire hazards with absolutely no accountability for their political science of spotted owl protection. The barred owls were eating the spotted owls all along. Hunting the barred owls now is being considered.

Coates & Casazza (2012) indicate that invasive plants, wildfire, and subsidized predation are likely the most important factors affecting sage grouse survivability. The least costly and most effective way of dealing with the first two factors is to simply restore the public lands to agricultural productivity. The onslaughts of agency employees and current management practices have not effectively diminished invasive weeds nor have they diminished wildfires. They are simply policies contributing to our regulatory burden and national debt.

It is crucial to understand that there are 535,000 sage grouse by agency count. The minimum viable population for genetic survivability – the Endangered Species Act listing criteria, is 5,000 birds (USFWS, 2010a). We have over 100 times the number of sage grouse for an effective population. Yet the agencies threaten they will list the bird unless citizens and local government acquiesce to the agency habitat management plans. Apparently we have over 100 times the number of bureaucrats for an effective population.

Further to this, consider the current eleven-state and two-province range of the sage grouse. It encompasses over 159,000 square miles, yet only 3.9 percent of the range supports twenty five percent of the birds (Doherty et al., 2010). This indicates that in order to protect the listing limit of 5,000 birds, a mere 421 mi<sup>2</sup> of the choice ground will suffice. Much more than that amount of choice ground is available in existing Wilderness Areas, National Parks and Grasslands, and National Forests.

Though I do not advocate reducing the existing sage grouse population, the range-wide persecution of producers is unfounded with regard to both the healthy sage grouse population and the extensive suitable habitat. Since persecution of producers is underway, it apparently is founded exclusively on political science, rather than natural science.

Even allowing for their unwarranted worry about the sage grouse, the agency solutions are the epitome of misplaced action. They add insult to the injury already inflicted on producers.

### **Predator Control is Habitat Management**

Ranchers, energy developers, miners and recreational land users all have been and will continue to be severely restricted by both existing and proposed habitat management policies. Conforming to the central planning prime directive, there is greater agency benefit to managing habitat than managing predators. Managing habitat alone requires significant personnel and equipment, but due to the time to implement, it may create the impression of a sage grouse population crisis – which ultimately would enhance agency power. Managing predators can be done almost exclusively by individual citizens, does not detract from other management techniques, solves the problem and ultimately diminishes the need for a large bureaucracy.

Ironically, by agency research, habitat management is critical primarily because of anthropogenic subsidization of predators. Although 94% of nesting failures are due to predation, agencies refuse to acknowledge that predator control can be effective. As Quinton Barr has shown (Steninger & Barr, 2012), from the 1920s through the 1950s, predator control using government hunters, along with bounties and incentives for civilian hunters, resulted in the highest verified sage grouse counts on record. From the 1960s forward, predator control was eliminated. Re-establishing predator control also would allow the bird to more fully utilize its range. The introductory statement the State of Wyoming makes concerning predation reads ‘As should be expected, predation is and has always been the major cause of sage-grouse mortality’ (WGFD, 2003).

The predation control studies indicate the territorial ravens, knowing their normal hunting range, are three times as effective at nest depredation as the transitory birds (Coates, 2012). When the territorial ravens are removed by predation control, the transitory ravens, no longer harassed out, may replace the territorial birds at twice the density. The two replacement birds thus hunt at a combined two-thirds the effectiveness of the removed raven. There is an immediate benefit in using predator control, despite the government scientist and agency bureaucrat conclusions to the contrary.

An important consideration is the nesting phase kill ratio of seven to one. There is an average of seven eggs per clutch. Since sage grouse abandon depredated nests, all seven eggs are lost with each predation event, whether the predators eat one or all seven. This kill ratio is not met in any other phase of the sage grouse life cycle. Common sense and common decency cry for predator control.

In a March 22 public comment on the Western Region Greater Sage-Grouse Planning Strategy (Sacrison, 2012), I proposed predator bounties. The reader is directed to that document for an

approach which manages animals rather than people, and will lead to a rapid and significant sage grouse population increase. Regarding ravens, this can be done with depredation permits (USFWS, 2010b) under 50 CFR 21.41. Further to that is Wyoming's suggestion that USFWS do a species assessment on ravens and consider including ravens in the 50 CFR 21.43 Depredation order for blackbirds, cowbirds, grackles, crows and magpies (WGFD, 2003, USFWS, 2010c).

### **The Central Planning Philosophy**

How then do the agencies justify wielding the perfect as the enemy of the good? How do the agency employees explain that because they cannot save two-thirds of the preyed-upon sage grouse, they will not nor will they allow us to save the other one-third?

Sadly, the agency insistence on centrally-planned habitat management alone is both cruel and selective. While ranchers and others are persecuted in the northern part of Nevada, the sage grouse itself is assaulted in the center and south. State and Federal agencies are cooperating in the Southern Nevada Water Authority plan which will dewater sage grouse habitat for the benefit of Las Vegas. A time is coming when water poured in Las Vegas will kill sage grouse to the north. What is the agency justification in allowing that killing, and how do the agency employees explain their decisions?

There is no clear natural science basis for the bureaucratic control of people and land on behalf of sage grouse. In fact, there is no legal basis. The birds themselves are not the object, for the population is healthy and they do not fully utilize the available habitat. The object of habitat management alone is for the agencies to obtain large budgets and exercise control over people and land.

Again, controlling predation solves the most significant problem affecting the sage grouse. Solving a problem is anathema to the agencies, because they cannot be assured another problem will arise to justify their size and perhaps very existence. The political science of central planning encourages if not requires an expansion rather than contraction in the size of government.

If the agencies honestly were concerned with saving sage grouse, they would immediately adopt aggressive predator control. Additionally, they would halt the impending killing of sage grouse by planned water removal. Could it be they are willing to sacrifice thousands of birds in order to create examples and heighten arguments against future developments elsewhere? Is it unreasonable to speak so? Only if you think awarding bonuses and promotions to the lynx hoax perpetrators was reasonable (GAO, 2002).

## **A Taxpayer's Regulatory Mechanism**

The agencies claim regulatory mechanisms are needed. They are, and I suggest here an equitable mechanism based on well understood metrics. While the range-wide sage grouse population exceeds 100,000 or the habitable range exceeds the range necessary to support 100,000, for every dollar of costs the agencies inflict on counties and states in the sage grouse matter, the agencies should lose an equal amount of actual funds. Those county and state losses will be remunerated from general funds out of the U.S. Treasury. Furthermore, the agencies cannot incorporate expected county and state costs into their own budgets, because doing so simply perpetuates their proclivity to profit from their political science.

The general fund aspect provides a critical oversight of the sage grouse program since other offices and agencies will not only be aware of the disbursement, they will see how it affects their portion or potential in general funds. The loss of inflicted costs will remove the existing incentive to maximize the budget by maximizing the alarm.

As an example, the BLM is costing Elko County \$700,000 per year in lost wind energy revenues over the coming ten years. No birds are expected to be killed by the China Mountain production facilities. It is expected they will move some leks away from wind turbines. Perhaps not unlike teenagers moving a lover's lane when houses start going up. Life goes on somewhere else, and agency research shows the sage grouse have a broad, fruitful and underutilized range.

The \$700,000 should be paid from the U.S. Treasury to Elko County. There are additional revenues which the State of Nevada is losing. In like manner, Nevada also should be compensated for what is politically scientific oppression and persecution of producers. Though different costs and producers are involved, this example is applicable throughout the federally-controlled sage grouse range.

The taxpayer deserves and must demand this or a similar regulatory mechanism. Without it, all we are witnessing and funding is agencies profiteering from their political science on sage grouse. They did so with the spotted owl, and now are practicing even more contrived and contorted machinations to justify their bureaucracies.

Thank you for this opportunity to present a taxpayer's perspective.

Respectfully,

Ralph R. Sacrison

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**Sage Grouse Counts, Areal Extents, and Breeding Densities**

Population		Areal Extent					Breeding Density				
pct	count	pct	ha	ac	km <sup>2</sup>	mi <sup>2</sup>	ha/n	ac/n	n/km <sup>2</sup>	n/mi <sup>2</sup>	
25	133,750	3.9	2.92E+06	7.21E+06	29,192	11,271	21.8	53.9	4.6	11.9	a
50	267,500	10.0	7.58E+06	1.87E+07	75,782	29,259	28.3	70.0	3.5	9.1	a
75	401,250	27.0	2.04E+07	5.03E+07	203,633	78,621	50.7	125.4	2.0	5.1	a
100	535,000	54.5	4.12E+07	1.02E+08	411,810	158,997	77.0	190.2	1.3	3.4	a
83	446,563	30.0	2.27E+07	5.60E+07	226,629	87,500	50.7	125.4	2.0	5.1	b
0.9	5,000	0.1	1.09E+05	2.70E+05	1,091	421	21.8	53.9	4.6	11.9	c
183	980,966	100.0	7.55E+07	1.87E+08	755,088	291,535	77.0	190.2	1.3	3.4	d

Ralph R. Sacrison, June 20, 2012, *after*

- a Doherty et al. (2010) Mapping breeding densities of greater sage-grouse: A tool for range-wide conservation planning, Prepared for the Bureau of Land Management, BLM Completion Report: Interagency Agreement #L10PG00911, Sept. 24, 2010, Figure 1. [www.blm.gov/pgdata/etc/medialib/blm/wo/Communications\\_Directorate/public\\_affairs.Par.46599.File.tmp/GRSG%20Rangewide%20Breeding%20Density.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications_Directorate/public_affairs.Par.46599.File.tmp/GRSG%20Rangewide%20Breeding%20Density.pdf)
- b USFS & BLM controlled lands; population density from nearest quartile density.
- c Areas deduced from prime breeding ground density, using listing limit population.
- d Population deduced from Schroeder et al. (2004, *in* Doherty, 2010) estimate of range extent.

Agency declarations of historical sage grouse populations on the order of 1-2 M do not correlate with written history, bone fragments, predator residue nor the statistical distribution across existing range.

It does appear that the agencies seek effective control of land well beyond their existing mandate. The agencies state they must control habitat across their estimate of historic sage grouse range. They state this is to comply with the Endangered Species Act and so deny the US Fish & Wildlife Service a reason to list the bird. Their estimated historic range is shown in the final row of the table. Expanding control to that extent will effectively triple the land they manage without requiring any administrative or legislative permission.

Using existing range-wide breeding densities, fully populating the estimated historic range will nearly double the existing population. That existing population already is more than 100 times the requirement for genetic survivability. The listing population of 5,000 requires only 421 square miles of prime habitat, and there currently are more than ten such areas each of which will support the listing population.

On both population count and available habitat, there is no threat to the genetic viability of the bird. The current population essentially utilizes only half its available habitat, due in large to lack of predator control. Restoration of 1950s era predator control and grazing practices will restore the sage grouse to those highest verified population counts. Accelerated grazing will bring the added benefit of eliminating the present cycle of wildfires.

A scientifically and fiscally responsible regulatory mechanism is proposed. While range-wide sage grouse population exceeds 100,000 or the habitable range exceeds that necessary to support 100,000, for every dollar of costs the agencies inflict on counties and states in the sage grouse matter, the agencies should lose an equal amount of actual funds. Those county and state losses will be remunerated from general funds out of the US Treasury. Furthermore, the agencies cannot incorporate expected county and state reimbursements into their own agency budgets, because doing so simply perpetuates their propensity to profit from their political science.

The general fund aspect provides a critical oversight of the sage grouse program since other offices and agencies will not only be aware of the disbursement, they will see how it affects their portion or potential from general funds. The loss of inflicted costs will remove the existing incentive to maximize the budget by maximizing the alarm. Without these mechanisms, the enduring subsidized predator in the sage grouse debacle is the bureaucracy which preys on the American taxpayer.

## The Ultimate Subsidized Predator

In the ongoing sage grouse controversy, it is crucial to understand that by agency count there are 535,000 birds. The minimum viable population for genetic survivability – the Endangered Species Act listing criteria, is 5,000 birds. We have over 100 times the number of sage grouse required for an effective population. Yet federal agencies threaten they will list the bird unless citizens and local government acquiesce to oppressive agency habitat management plans. Apparently we have over 100 times the number of bureaucrats required for an effective population.

Further to this, consider the eleven-state and two-province range of the bird. Encompassing over 159,000 square miles, only 3.9 percent of the range supports twenty five percent of the birds. This indicates that to protect the listing limit of 5,000 birds, a mere 421 square miles of choice ground will suffice. By agency maps, there already are more than ten areas of prime habitat each of which support genetic survivability. The low population-density expanses apparently are due substantially to predators.

Predation control studies indicate territorial ravens, knowing their normal hunting range, are three times as effective at nest depredation as transitory birds. When territorials are removed by predation control, the transitory ravens, no longer harassed out, may replace the territorial birds at twice the density. The two replacement birds thus hunt at a combined two-thirds the effectiveness of the removed raven. There is an immediate benefit in using predator control, despite government scientist and bureaucrat declarations otherwise.

Similar to their ineffective but onerous spotted owl restrictions, the agencies are persecuting producers and recreational land users with high-cost habitat management while not admitting the essence of that approach is to actually manage predator habitat. Since predators are the greatest problem and always have been, why not deal with them quickly and effectively? Because bureaucrats thrive on delay and inefficiency. Listing will require significant increases in budgets and staff.

The agencies claim regulatory mechanisms are needed. They are, and I suggest here an equitable mechanism based on well understood metrics. While range-wide sage grouse population exceeds 100,000 or the habitable range exceeds that necessary to support 100,000, for every dollar of costs the agencies inflict on counties and states in the sage grouse matter, the agencies should lose an equal amount of actual funds. Those county and state losses will be remunerated from general funds out of the U.S. Treasury. Furthermore, the agencies cannot incorporate



expected county and state costs into their own budgets, because doing so simply perpetuates their proclivity to profit from their political science.

The general fund aspect provides a critical oversight of the sage grouse program since other offices and agencies will not only be aware of the disbursement, they will see how it affects their portion or potential from general funds. The loss of inflicted costs will remove the existing incentive to maximize the budget by maximizing the alarm. Without these mechanisms, the enduring subsidized predator in the sage grouse debacle is the bureaucracy which preys on the American taxpayer.

Respectfully,

Ralph R. Sacrison

May 18, 2012

**Sage Grouse Counts, Areal Extents, and Breeding Densities**

Population		Areal Extent					Breeding Density				
pct	count	pct	ha	ac	km <sup>2</sup>	mi <sup>2</sup>	ha/n	ac/n	n/km <sup>2</sup>	n/mi <sup>2</sup>	
25	133,750	3.9	2.92E+06	7.21E+06	29,192	11,271	21.8	53.9	4.6	11.9	a
50	267,500	10.0	7.58E+06	1.87E+07	75,782	29,259	28.3	70.0	3.5	9.1	a
75	401,250	27.0	2.04E+07	5.03E+07	203,633	78,621	50.7	125.4	2.0	5.1	a
100	535,000	54.5	4.12E+07	1.02E+08	411,810	158,997	77.0	190.2	1.3	3.4	a
83	446,563	30.0	2.27E+07	5.60E+07	226,629	87,500	50.7	125.4	2.0	5.1	b
0.9	5,000	0.1	1.09E+05	2.70E+05	1,091	421	21.8	53.9	4.6	11.9	c
183	980,966	100.0	7.55E+07	1.87E+08	755,088	291,535	77.0	190.2	1.3	3.4	d

Ralph R. Sacrison, June 20, 2012, *after*

- a Doherty et al. (2010) Mapping breeding densities of greater sage-grouse: A tool for range-wide conservation planning, Prepared for the Bureau of Land Management, BLM Completion Report: Interagency Agreement #L10PG00911, Sept. 24, 2010, Figure 1. [www.blm.gov/pgdata/etc/medialib/blm/wo/Communications\\_Directorate/public\\_affairs.Par.46599.File.tmp/GRSG%20Rangewide%20Breeding%20Density.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications_Directorate/public_affairs.Par.46599.File.tmp/GRSG%20Rangewide%20Breeding%20Density.pdf)
- b USFS & BLM controlled lands; population density from nearest quartile density.
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- d Population deduced from Schroeder et al. (2004, *in* Doherty, 2010) estimate of range extent.

Agency declarations of historical sage grouse populations on the order of 1-2 M do not correlate with written history, bone fragments, predator residue nor the statistical distribution across existing range.

It does appear that the agencies seek effective control of land well beyond their existing mandate. The agencies state they must control habitat across their estimate of historic sage grouse range. They state this is to comply with the Endangered Species Act and so deny the US Fish & Wildlife Service a reason to list the bird. Their estimated historic range is shown in the final row of the table. Expanding control to that extent will effectively triple the land they manage without requiring any administrative or legislative permission.

Using existing range-wide breeding densities, fully populating the estimated historic range will nearly double the existing population. That existing population already is more than 100 times the requirement for genetic survivability. The listing population of 5,000 requires only 421 square miles of prime habitat, and there currently are more than ten such areas each of which will support the listing population.

On both population count and available habitat, there is no threat to the genetic viability of the bird. The current population essentially utilizes only half its available habitat, due in large to lack of predator control. Restoration of 1950s era predator control and grazing practices will restore the sage grouse to those highest verified population counts. Accelerated grazing will bring the added benefit of eliminating the present cycle of wildfires.

A scientifically and fiscally responsible regulatory mechanism is proposed. While range-wide sage grouse population exceeds 100,000 or the habitable range exceeds that necessary to support 100,000, for every dollar of costs the agencies inflict on counties and states in the sage grouse matter, the agencies should lose an equal amount of actual funds. Those county and state losses will be remunerated from general funds out of the US Treasury. Furthermore, the agencies cannot incorporate expected county and state reimbursements into their own agency budgets, because doing so simply perpetuates their propensity to profit from their political science.

The general fund aspect provides a critical oversight of the sage grouse program since other offices and agencies will not only be aware of the disbursement, they will see how it affects their portion or potential from general funds. The loss of inflicted costs will remove the existing incentive to maximize the budget by maximizing the alarm. Without these mechanisms, the enduring subsidized predator in the sage grouse debacle is the bureaucracy which preys on the American taxpayer.

## Songbirds, sage hen and shame

In times past I awoke to songbirds and doves. Now it is to the cawing of ravens.

At their June 22 and 23 meeting, Nevada Board of Wildlife Commissioners voted to eliminate funding predator control programs intended to protect sage grouse. They did fund research into Pine Nut Mountains vegetation and sage grouse. Apparently helpful, and conveniently near agency central offices.

Over the last four decades, the Nevada Department of Wildlife has de-emphasized predator control. Raven takings have ranged between zero and 1,500 while the population has increased 600 percent. The statewide raven population may exceed 952,000 at an average density of 8.7 per square mile. Thus, at its most intense effort, the agency takes less than two tenths of a percent of the predators which may outnumber the sage grouse nearly eleven to one. Meanwhile, agency personnel threaten county officials that they would list sage grouse as endangered because it needs agency protection.

Studies of sage grouse nest failure indicate that in areas of greater than 2.4 ravens per square mile only fifty percent of nests will survive. At 5.8, virtually all nests fail.

The agencies insist that removing territorial ravens simply provides the opportunity for transitory ravens to move in at twice the density. But territorials hunt at triple the efficiency of transitorials, so the net depredation efficiency becomes two thirds. A fifty percent depredation may drop to thirty-three, meaning the survival rate rises from fifty to sixty-seven percent.

The scientific method, common sense, and common decency all cry for aggressive predator control on behalf of sage grouse. But these three concepts apparently are not in the lexicon of the Board, NDOW, nor other agencies and groups presuming to act on behalf of the bird. This despite historical records indicating the highest confirmed sage grouse populations were during the decades of extensive sheep and cattle grazing and aggressive predator control. Also, much lower wildfire incidence and intensity occurred during those years. Tellingly, agencies are reticent to discuss wildlife loss from firestorms on undergrazed range.

The bureau-scientific complex has substituted political science for the natural sciences. That does provide a certain efficiency in that all conclusions become uniform and rote. It has instituted a troika system whereby stakeholders outside the complex have no recourse beyond the agency troika which juries, judges, and executes all verdicts.

Agency officials declare sage grouse population counts don't matter, only habitat control matters. What they really are saying is they do not care that private sector grazing practices and private sector predator control may increase the bird's population by one-third or more. The

agencies want the budgets which will come with increased control; they do not want ranchers and farmers doing well without bureaucrats.

Ravens prey on much more than sage grouse. Among the songbirds formerly serenading the neighborhood were Mountain Bluebirds. Since they sanction the raven's status by accepting its predation, will the Wildlife Board now move to adopt the raven as the state bird? Practicing political science does not require shame... .

Respectfully,

Ralph R. Sacrison

June 30, 2012

**Sage Grouse Nesting Success v. Raven Abundance**

Sage Grouse Nest Success Percent	Raven Density		
	per 10km Transect	per km <sup>2</sup>	Areal Conversion per mi <sup>2</sup>
73.0	-	-	-
60.0	3.8	0.48	1.2
50.0	7.3	0.91	2.4
40.0	10.0	1.25	3.2
30.0	13.8	1.73	4.5
20.0	18.0	2.25	5.8
10.0	24.0	3.00	7.8
-	30.0	3.75	9.7

The transects are reported in 10 km segments, 0.8 km wide.

The area of a transect is 8 km<sup>2</sup> or 3.09 mi<sup>2</sup>.

$$A_{\text{tran}} = 8.00 \text{ km}^2$$

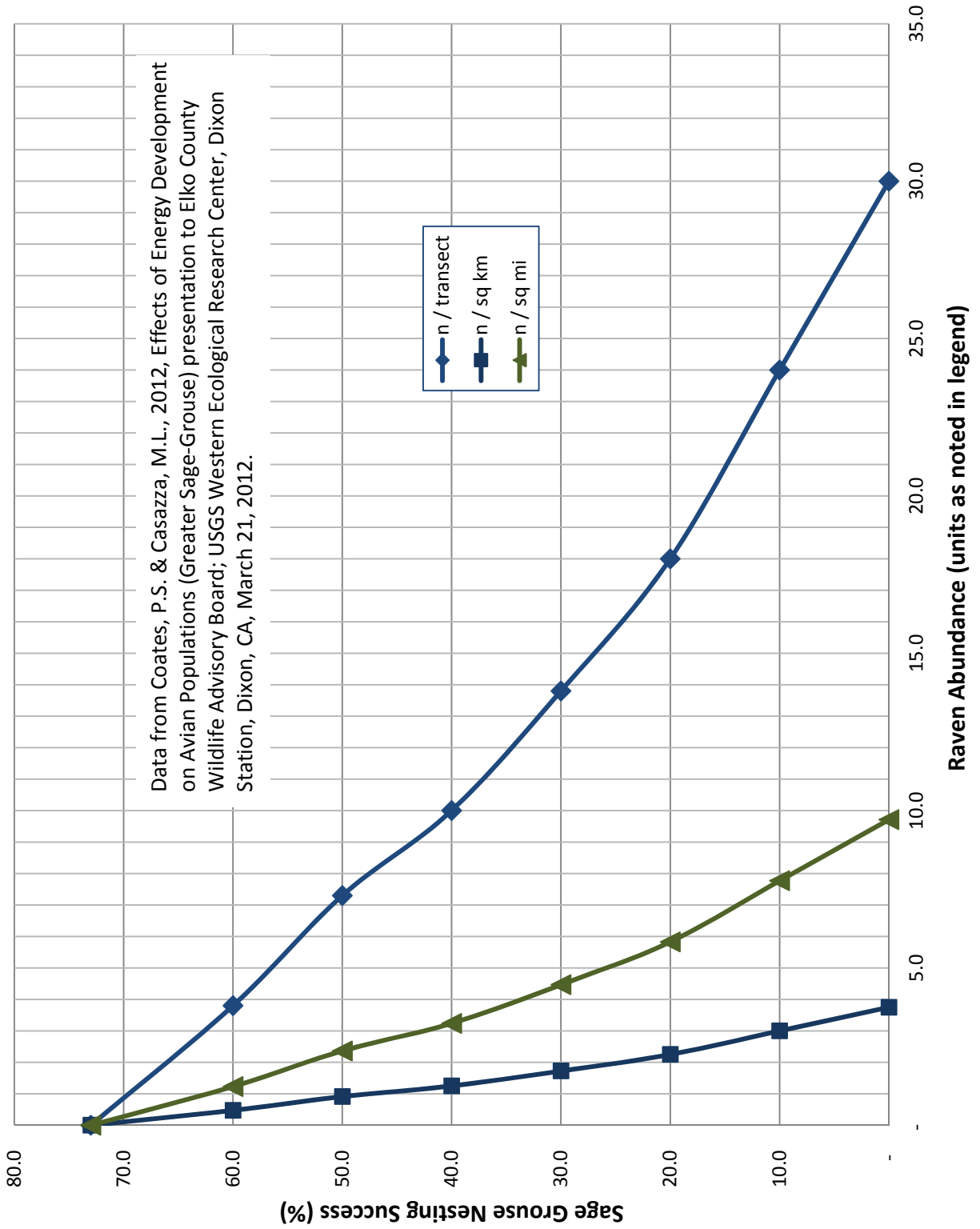
$$A_{\text{tran}} = 3.09 \text{ mi}^2$$

In annotations to the graph from which the above table was constructed, Coates & Casazza stated that at 18 ravens per 10km, all nests ultimately failed.

Coates, P.S. & Casazza, M.L. 2012  
 Effects of Energy Development on Avian Populations (Greater Sage-Grouse), presentation to Elko County Wildlife Advisory Board, Elko NV; US Geological Survey, Western Ecological Research Center, Dixon Station, Dixon, CA, March 21, 2012

# Sage Grouse Nesting Success vs. Raven Abundance

Data from Coates, P.S. & Casazza, M.L., 2012, Effects of Energy Development on Avian Populations (Greater Sage-Grouse) presentation to Elko County Wildlife Advisory Board; USGS Western Ecological Research Center, Dixon Station, Dixon, CA, March 21, 2012.



### **Famine officers and regulation without representation**

‘He has erected a multitude of New Offices, and sent hither swarms of Officers to harass our people, and eat out their substance.’

-from The unanimous Declaration of the thirteen united States of America, July 4, 1776.

The year draws to a close amid holidays of Thanksgiving, Christmas and New Year’s. Our extended season of gratitude, reverence and hope has been a society hallmark for generations. Commonly, evaluation and planning occur in step with this annual transition - in personal, community and corporate spheres. An ongoing endeavor is planning annual agricultural activity.

This can be a fairly involved exercise, even for small family farms and ranches. A significant factor is that nowadays, planning is subject to approval of government agents. Among the myriad aspects under the control of a federal functionary are what is planted, and where; what improvements (funded exclusively by the farm and ranch) are needed and permitted; the size of herds; where and when they graze.

Intended or unintended, great famines the world has seen have been conducted in large through central planning. In centuries past these steppes (pun intended) were taken by autocracies, more recently by troikas and politburos. The apparatchik spawn in our country are famine officers in the sense of Vonnegut’s fire officers from a dark future. In forest and range management, they have and continue to restrict production with their central plans.

This year the federal officers use climate change and drought, along with sage grouse, as their rationalizations. So ranchers are being told they must only utilize a third of their open range capacity, and one-tenth of their riparian area capacity.

Consider 909 cattle allowed on a 522,000-acre allotment. Using a whole number for ease of arithmetic, a nominal stock price of \$1/lb for 1,000-lb animals requiring three years to raise to market results in an annual allotment value of \$303,000. Considering supply and demand, what would the \$1 stock price reach were the two-thirds reduction range-wide?

Another perspective is to consider the land’s productive value of \$.58 per acre. It is instructive in terms of your supermarket purchase of beef. How many acres does a consumer require in order to meet their needs? And how many acres are famine officers removing from production?

Famine may not occur solely from the restrictions on public land production. But how many businesses can survive a government-mandated production level only one-third of normal? The fixed expenses and sunk costs remain, but regulators have no concern for financial viability, nor

is there recourse for the persecuted producers. And other agencies exert significant control on private land production, while the goal of controlling climate is becoming a bureaucratic universal since their resulting budget potential grows with those controls. The bureau-scientific complex has promulgated rules and instituted practices whereby the lone producer can protest only to an agency administrator within the executive branch. It is regulation without representation - the modern variant of our nation's revolutionary flashpoint. And for the third day the rains are coming in... .

Respectfully,

Ralph R. Sacrison

Dec. 2, 2012



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### Quoth Obama's raven – 'Ever more'

The transformational change the nation is undergoing should be heralded to all peoples of the world. In 1782, the bald eagle was selected as our national symbol of majestic strength. In the Obama era of post-exceptional America, strength and the dignity of noble action are progressively uncelebrated characteristics. Despite our actual history of sacrifice in escaping oppression, then fighting oppression, and consistent welcoming of oppressed souls from around the world, the educational bureaucracy now indoctrinates that we are fundamentally an oppressive and imperialist nation.

Since teaching shame of and apologizing for our nation continues, the honored symbol may as well be replaced. What better icon of the currently engorged administration and its regulators than the common raven? These cunning, deceptive, endemic subsidized predators conform philosophically to current executive branch ideals. They are all-consuming, adjusting their diet to sustain the voracity which ensures their growth and propagation above all others dwelling across the lands they survey.

Ravens are awesome adaptive omnivores. They take anthropogenic foods such as road kill, slaughterhouse waste, organic refuse at landfills, livestock after-birth, grains and fruit. Figuratively and literally, they feed off producers. Their natural foodstuffs include small mammals, amphibians, reptiles, birds, and insects, upon all of which ravens are accomplished hunters.

Documentation of nestling and egg predation by ravens is extensive. Among the species named here are some which are endangered or threatened with extinction: avocet, California condor, greater sandhill crane, golden eagle, western snowy plover, stilts, California least tern, marbled murrelets, San Clemente Island loggerhead shrikes, least Bell's vireo, pinyon jays, greater sage-grouse, herring gulls, ring-billed gulls, common murre, thick-billed murre, Brunnich's guillemot and sand crabs.

Attacking and taking of juveniles and adults includes rock doves, eiders, northern flicker, black-legged kittiwakes, murre, grebes, desert tortoises, toads, cats and mice. Ravens also are known to peck at the eyes and noses of newborn livestock. But after all, some sanction these assaults and killings.

Songbird populations are reduced by direct predation and perhaps moreso by their reaction to predators in the area. When songbirds perceive a risk of predators, they dramatically reduce the number of offspring they produce. That reinforces the use of the raven as the transformational symbol, since in the Chicago Way, any who sing are eliminated - unto their families if appropriate.

Exhibiting both singular and at times coordinated aggressiveness toward their prey, ravens are the perfect all-purpose symbol for the bureaucratic persecution of producers which is become emblematic of the executive branch. Ravens behave as if they are entitled to the labors of the

producers, much like the nation's pork-entitled taking half now lives off the making half. Again, behavior encouraged and coordinated by the executive branch.

The National Emblem Act of 1940 currently protects the bald eagle. Coincidentally, the regulators protect the raven with permit requirements under 50CFR21. All that is suggested here is acknowledgement of the raven's apparent conformance with the administration's operating philosophy. Certainly Mr. President, along with your entire bureaucratic phalanx and entourage – the raven is now your bird.

A taxpayer,

Ralph R. Sacrison

January 3, 2013

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## Of fish, grass and sage

The central planners of the nation continue enacting policies from on high. We are told to work with them; they are wise and produce the finest plans. The 'Idle Iron' program includes the demolition of legs of oil platforms which were abandoned thirty and forty years ago. The underwater explosions drop the towers entirely to the seafloor, while floating tens of thousands of pounds of dead fish to the surface each time. Corals, sponges and others are shattered as testament to bureaucratic wisdom. The central planners are destroying what has become a series of man-made reef clusters across the Gulf of Mexico. But the cost requirements fulfill the prime directive of enlarging the bureaucracy.

At his recent Northern Nevada Stewardship Group presentation, Dr. Pete Coates stated that sixty percent of nest depredation is due to ravens, and ninety-five percent of total nesting loss is due to depredation. Though independent groups such as Smoked Bear report, agencies never report counts of wildlife loss due to fire. With both depredation and fire loss, the agency response is to downplay actions which have substantially protected the sage grouse. Ted Koch, Nevada State Supervisor of the USFWS, addresses predator control only as the last resort. Collecting roadkill to discourage predator attraction and congregation has higher priority. Warding ravens off by daily covering landfills with tarps is not useful to sage grouse. High-personnel programs are the agency goals, whether spotted owl, sage grouse or red snapper are killed under those very programs.

Despite the bloodstained reality that predators decimate sage grouse nine times over, the agencies tell us that predator control is a long-term problem and should not be initiated because we will have to pursue it indefinitely. Studies and policy drafts with indefinite timetables are acceptable, but actions which may reduce the need for a massive bureaucracy are unacceptable to the political science class.

Following their mindset of perceived futility, if we allowed bureaucrats to direct ranching, they would stop raising cattle because they would just have to do it again next year. Oh, wait – they do direct ranching and have virtually eliminated sheep in Nevada and are persistently reducing cattle allotments.

Regarding fire control, the history denied by the agencies but lived by many of us reinforces the common sense that grazing reduces cheat grass, fuel load and the commensurate incidence of firestorms. Contemporary cheat grass invasions and firestorms in large follow grazing restrictions. The agency favor toward the massive budgets which billow from those firestorms begs troubling questions. In firefighting, the agencies enthusiastically treat the high-budget symptom, but apparently not so the cause. In predator control, the cause (predation) is called the symptom and therefore ignored in favor of high-cost landscape mismanagement with control of use and access.

The central agencies irresponsibly ignore range science of generations past, and while planning a bureaucrat-filled future allow predators to devastate sage grouse with each nesting cycle. Yet we see by their fishkill, birdkill and expanse of cheat grass, how miraculously they feed their bureaucracy.

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## **Opportunity or Opportunity Cost**

The world long has embraced America as the Land of Opportunity. Of late, America fashions itself as the Land of Opportunity Cost. Ill-conceived and ill-applied regulations are used to persecute producers while favoring regulators, environmental lobbyists and political operatives.

The Bureau of Land Management operates under Instruction Memorandum No. 2012-043. This document, issued on Dec. 27, 2011 by an acting director, officially expires in September, 2013 unless renewed or effectively implemented by that time. Its nature is to condition both agency and public for endangered species listing of the Greater Sage-Grouse through initiating ESL measures before actual listing. In this manner, agency personnel will not miss a beat since they will have had a couple years' practice at ESL enforcement. The public will not notice a change since the change already will have occurred with scant publicity.

The agency is in the process of removing from Elko County production a total of 1,875 square miles in order to protect the sage grouse. Essentially saying humans are unfit to use an area the size of Delaware. Using the USDA agricultural census, the agricultural productivity to be lost totals nearly \$31 million per year. Some of the removed ground has mineral or natural gas potential, with their concomitant potential for direct and indirect jobs. Incidentally, the over 14,000 heavily-regulated quarries and mines in the lower 48 now cover 2,584 square miles.

In March 2012, the BLM announced an Elko County oil and gas lease reduction from 208 to 113 square miles. The agency touts collecting \$1,788,595 in lease fees, but not the opportunity cost associated with the withdrawn parcels.

In 2012 there were 11,189 BLM employees taking nearly \$1.3 billion from taxpayers in order to control taxpayers on 387,500 square miles of agency land. So taxpayers are paying the agency nearly \$3,300 per square mile to be added to the minimum opportunity cost of over \$16,000 per square mile in lost agricultural production here in Elko County. When the mineral estate and additional counties are factored in, the astonishing nationwide economic destruction these agencies inflict comes to light.

The BLM maintains they bring \$5 billion to the economy across the lands they manage. If they had not been party to destroying the timber industry, if they didn't regularly inspire natural resource firms to explore abroad, how much greater would be the economic and social benefits, and their own scientific integrity?

The most recent agency-announced number of 535,000 sage grouse is more than 100 times the limit necessary for endangered or threatened species listing. The apparent surfeit of more than 100 times the number of necessary bureaucrats claims the count does not matter – habitat alone



is important. Since they will not consider the historical predator management and grazing enhancement of sage grouse habitat, it is apparent the enhanced habitat they really seek is their own, at taxpayer's expense. The executive branch agencies evidently have determined that producers should be persecuted by reducing their productivity – states, counties, municipalities, taxpayers, employees and families be damned.

Respectfully,

Ralph R. Sacrison

March 29, 2013

**Selected Productivity and Regulatory Statistics  
Taxpayer and Producer Perspective**

**March 28, 2013**

**1 Local**

1.1	Land Area Characteristics			
1.11	State of Nevada	109,826	mi <sup>2</sup>	
1.12	State of Nevada (incl. water surfaces)	111,791	mi <sup>2</sup>	
1.13	Nevada rangeland	89,844	mi <sup>2</sup>	
1.14	Nevada cropland	2,233	mi <sup>2</sup>	
1.15	Nevada forestland	15,261	mi <sup>2</sup>	
1.16	Elko County Area	17,170	mi <sup>2</sup>	
1.17	Elko County Ranch Area (cropland excluded)	2,960	mi <sup>2</sup>	
1.18	Elko County Ranch Area	3,258	mi <sup>2</sup>	
1.19	Elko County Sage Grouse Withdrawal Area	1,875	mi <sup>2</sup>	ECC, 2013
1.2	Demographic Characteristics			
1.21	Nevada Population	2012 est.	2,758,931	ea
1.22	Elko County Population	2012 est.	51,216	ea
1.23	Elko County Ranches		294	ea
1.24	Elko County Cattle		129,276	ea
1.3	Economic Characteristics			
1.31	Elko County Agricultural Cost of Operation		43,300,000	\$
1.32	Elko County Ranch Sales (cattle)		51,177,000	\$
1.33	Elko County Agricultural Sales (crops and livestock)		53,599,000	\$

**2 Federal**

2.1	Land Area Characteristics			
2.11	BLM total management area	387,500	mi <sup>2</sup>	BLM, 2013a
2.12	Federal Land mgmt in NV	84.5		GSA, 2004
2.13	Federal Land mgmt in NV	86.0		Barr, 2007
2.14	BLM mgmt area in NV	75,000	mi <sup>2</sup>	BLM, 2013b
2.15	Preliminary March 2012 lease amount	75	ea	
2.16	Preliminary March 2012 lease amount	208	mi <sup>2</sup>	
2.17	Final March 2012 lease amount	42	ea	
2.18	Final March 2012 lease amount	113	mi <sup>2</sup>	
2.2	Demographic Characteristics			
2.21	National BLM Staff	11,189	ea	BLM, 2013a
2.22	Elko County BLM Staff			
2.3	Economic Characteristics			
2.31	National BLM Budget, 2012	1,276,990,000	\$	BLM, 2013a
2.32	BLM fee/permit offsets (2012 est)	279,364,000	\$	BLM, 2013a
2.33	BLM claimed financial benefit	5,000,000,000	\$	BLM, 2013a

**Selected Productivity and Regulatory Statistics  
Taxpayer and Producer Perspective**

**March 28, 2013**

**3 Ratios and Factors**

3.1 Procedure

The Section 3 primary headings below are the analyzed relationships. The characteristics from the Local and Federal groupings are carried in a right-justified format to distinguish them from the Section 3 headings and indicate the continuity and source from the groupings above.

3.2 Withdrawal as percent of ranch area

1.19 Elko County Sage Grouse Withdrawal Area	1,875 mi <sup>2</sup>	57.55 percent
1.18 Elko County Ranch Area	3,258 mi <sup>2</sup>	

3.3 Elko County Agricultural Sales per area

1.33 Elko County Agricultural Sales (crops and livestock)	53,599,000 \$	16,451 \$/mi <sup>2</sup>
1.18 Elko County Ranch Area	3,258 mi <sup>2</sup>	

3.4 Annual production loss to withdrawal

1.19 Elko County Sage Grouse Withdrawal Area	1,875 mi <sup>2</sup>	
Elko County Agricultural Sales per area	16,451 \$/mi <sup>2</sup>	30,846,348 \$

3.5 Sales per head of cattle

1.33 Elko County Agricultural Sales (crops and livestock)	53,599,000 \$	415 \$/ea
1.24 Elko County Cattle	129,276 ea	

3.6 Taxpayer cost per BLM area

2.31 National BLM Budget, 2012	1,276,990,000 \$	3,295 \$/mi <sup>2</sup>
2.11 BLM total management area	387,500 mi <sup>2</sup>	

3.7 Taxpayer cost per BLM employee

2.31 National BLM Budget, 2012	1,276,990,000 \$	114,129 \$/ea
2.21 National BLM Staff	11,189 ea	

3.8 Taxpayer fee gain per BLM employee

2.32 BLM fee/permit offsets (2012 est)	279,364,000 \$	24,968 \$/ea
2.21 National BLM Staff	11,189 ea	

3.9 BLM claimed benefit per area

2.33 BLM claimed financial benefit	5,000,000,000 \$	12,903 \$/mi <sup>2</sup>
2.11 BLM total management area	387,500 mi <sup>2</sup>	

**Notes:** Statistics from 2007 Agricultural Census u.n.o. References detailed in the reading list following this table.

The cropland in Elko is almost exclusively hay, grass silage, and greenchop. The crop acreage has been removed from the overall ranch area to reflect the range area alone. Because of the near-exclusive commitment of Elko County acreage to ranching and ranch forage, the overall agricultural costs and gains are used in this analysis.

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## Counting for nothing

In the Findings for Petition to List the Greater Sage-Grouse, the US Fish & Wildlife Service declares there are 535,000 sage grouse range-wide. Though more than 100 times the trigger for listing as endangered or threatened, the only reason the agency has not listed the bird is budget constraint. So, rather than bird status, the operative concept is that the 2.4 \$B the 9,290 employees take from taxpayers every year simply is not enough. Cooperating agencies such as the Bureau of Land Management and US Forest Service consume additional billions of dollars through tens of thousands of employees. Bureaucrats have transformed the objectivity of the scientific method into the objectionability of political science.

The Findings declare that human activity is causing an approximate 2.5% per year reduction in the bird's population. They rationalize that loss as inexorable unless they implement draconian solutions requiring complex control of human activity. Questionable range-wide habitat management is being proscribed. Here in Elko County, it includes the BLM quarantining 1,875 square miles from human use, causing an annual 31 \$M in ranching economic loss alone.

What really is behind a static or diminishing population? Using a female population of 60%, there are 321,000 hens. With an average uninterrupted or normal life span of 4.5 years, the number of females is multiplied by the ratio of 3.5/4.5, accounting for the fact that nestlings are not breeding population. The maximum nest potential is approximately 250,000. With an average clutch size of 7, over 1.7 M eggs annually are produced for propagation of the species.

Given the life span and declared population, the mortality count of the bird is about 119,000. So the incremental population base is 416,000. When the annual egg production is added, the subsequent potential maximum population is more than 2.1 M sage grouse. With the agency-declared annual decrement of approximately 2.5%, or 13,000 after the first year, the result is 522,000 birds. Subtracting that from 2.1 M indicates an apparent annual loss of over 1.6 M birds.

With predation accounting for 90% of nesting loss, the balance apparently is due in large to fire. Other than by fire, habitat loss does not kill directly; birds are known to simply walk or fly to other areas. Apparently there is fire loss exceeding 164,000, and a predation loss of over 1.4 M birds. Predation research indicates ravens alone could account for that carnage, and with their 30% annual population growth, they will.

Though only one life stage and one yearly cycle are presented here, this discussion is valid though long evaded by the agencies. Agricultural producers live crop, livestock and wildlife stages and cycles, understanding them far greater than do central planners. Yet the bureau-scientific complex continues to ignore the producers and sometimes their entire counties.

In mandating long-term habitat management with minimal predator control, the multiple agencies annually sanction approximately 1.4 M slaughtered sage hen embryos. Though they traffic in humans, not even Planned Parenthood has achieved that level of publicly-funded selective destruction of life.

Respectfully,

Ralph R. Sacrison

April 22, 2013

**Sage grouse statistics and analyses**  
**Taxpayer and Producer Perspective**

22-Apr-13

<b>1</b>	<b>Analysis of USFWS Species Assessment/Findings (B06W V02/50CFR17 Vol. 75 no. 55)</b>		
1.1	Population Base		
1.11	Range-wide population	535,000	
	Female percent of population	55 - 75	
1.12	Selected female percent of population	60.0	
1.13	Number of females	321,000	[1.11]*[1.12]/100
1.14	Apparent uninterrupted life span (yr)	4.5	
1.15	Number of bearing age females, nests	249,667	[(1.14)-1]*[1.13]/[1.14]
1.16	Average clutch size	7	
1.17	Max number of eggs for propagation	1,747,667	[1.15]*[1.16]
1.18	Natural morbidity of population	118,889	[1.11]/[1.14]
1.19	Incremental population base	416,111	[1.11]-[1.18]
1.2	Incremental population analyses		
1.21	Maximum potential population (annual)	2,163,778	[1.17]+[1.19]
1.22	Declared population decrement, annual (%)	2.5	
1.23	Declared population decrement, annual	13,375	[1.22]*[1.11]/100
1.24	Apparent population, subsequent year	521,625	[1.11]-[1.23]
1.25	Apparent loss, egg, nestling & adult, annual	1,642,153	[1.21]-[1.24]
1.26	Predation loss, annual (%)	90.0	
1.27	Predation loss, annual	1,477,938	[1.25]*[1.26]/100
1.28	Fire loss, annual	164,215	[1.21]-[1.24]
<b>2</b>	<b>Analysis check using nest predation research (Coates, 2007)</b>		
2.1	Population Characteristics		
2.11	Range-wide population	535,000	
	Female percent of population	55 - 75	
2.12	Selected female percent of population	60.0	
2.13	Number of females, nests	321,000	
2.14	Maximum observed nesting success (pct):	73.0	PhD, Fig. 4.1
2.15	Max number of successful nests	234,330	
2.16	Average clutch size	7	
2.17	Max number of eggs susceptible to raven	1,640,310	
2.18	Egg losses due to causes other than raven	606,690	



**Sage grouse statistics and analyses  
Taxpayer and Producer Perspective**

22-Apr-13

**Sage Grouse Nesting Success v. Raven Abundance**

Sage Grouse Nest Success Percent	Sage Grouse Egg Survival No.	Raven Density		
		per 10km Transect	per km <sup>2</sup>	per mi <sup>2</sup>
73.0	1,640,310	-	-	-
62.4	1,402,871	3.1	0.4	1.0 b
60.0	1,348,200	3.8	0.48	1.2
50.0	1,123,500	7.3	0.91	2.4
47.4	1,065,244	8.0	1.00	2.6 b
40.0	898,800	10.0	1.25	3.2
30.0	674,100	13.8	1.73	4.5
20.0	449,400	18.0	2.25	5.8
10.0	224,700	24.0	3.00	7.8
5.3	119,840	26.8	3.35	8.7 c
-	-	30.0	3.75	9.7

The transects are reported in 10 km segments, 0.8 km wide.

The area of a transect is 8 km<sup>2</sup> or 3.09 mi<sup>2</sup>.

$$A_{\text{tran}} = 8.00 \text{ km}^2$$

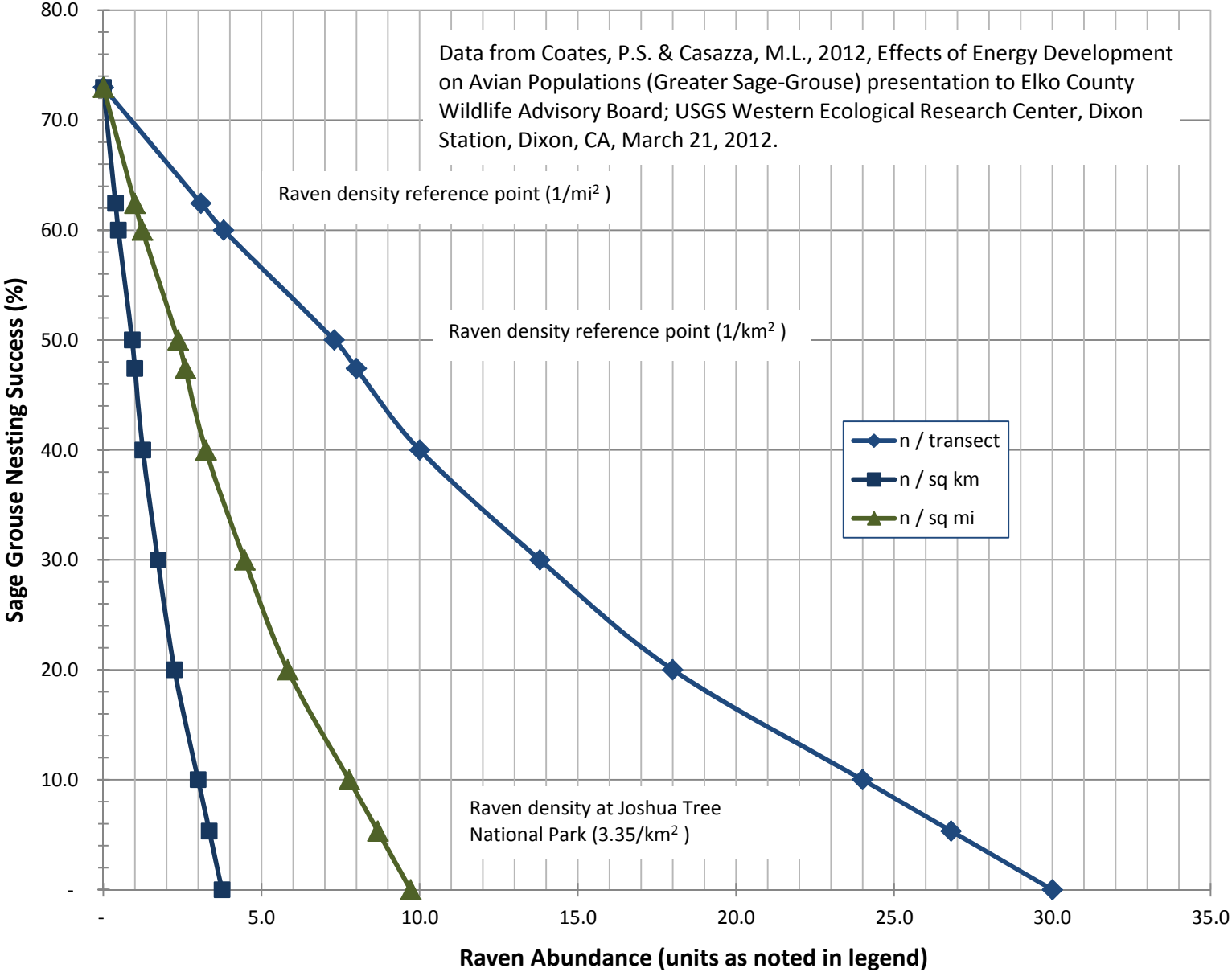
$$A_{\text{tran}} = 3.09 \text{ mi}^2$$

In annotations to the graph from which the above table was constructed, Coates & Casazza (2012) stated that at 18 ravens per 10km, (2.25/km<sup>2</sup>, 5.8/mi<sup>2</sup>) all nests failed.

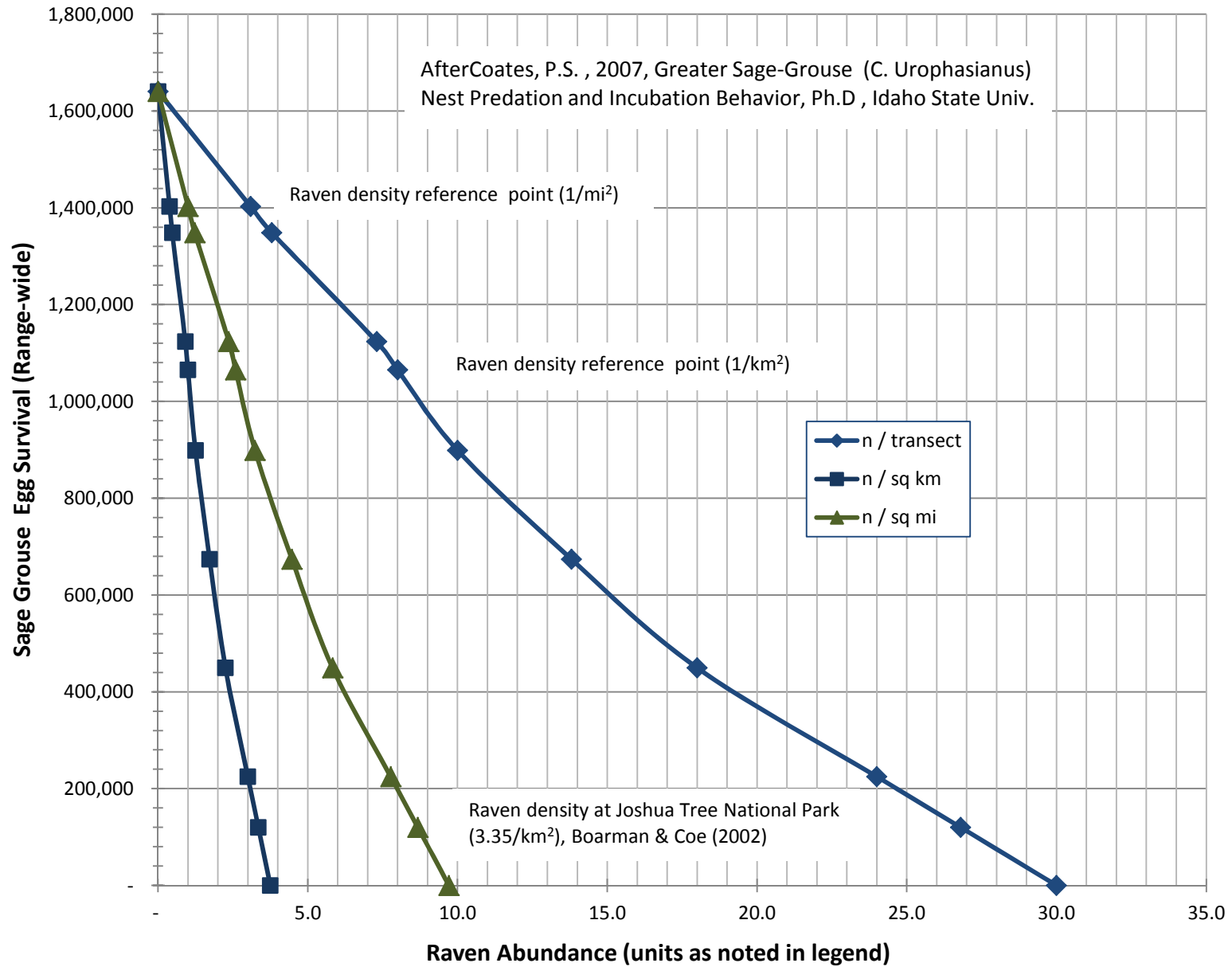
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- b Success interpolated to area unit values for ease of use.
- c Boarman & Coe, 2002 - JTNP raven density, sage grouse nest success interpolated.

### Sage Grouse Nesting Success vs. Raven Abundance

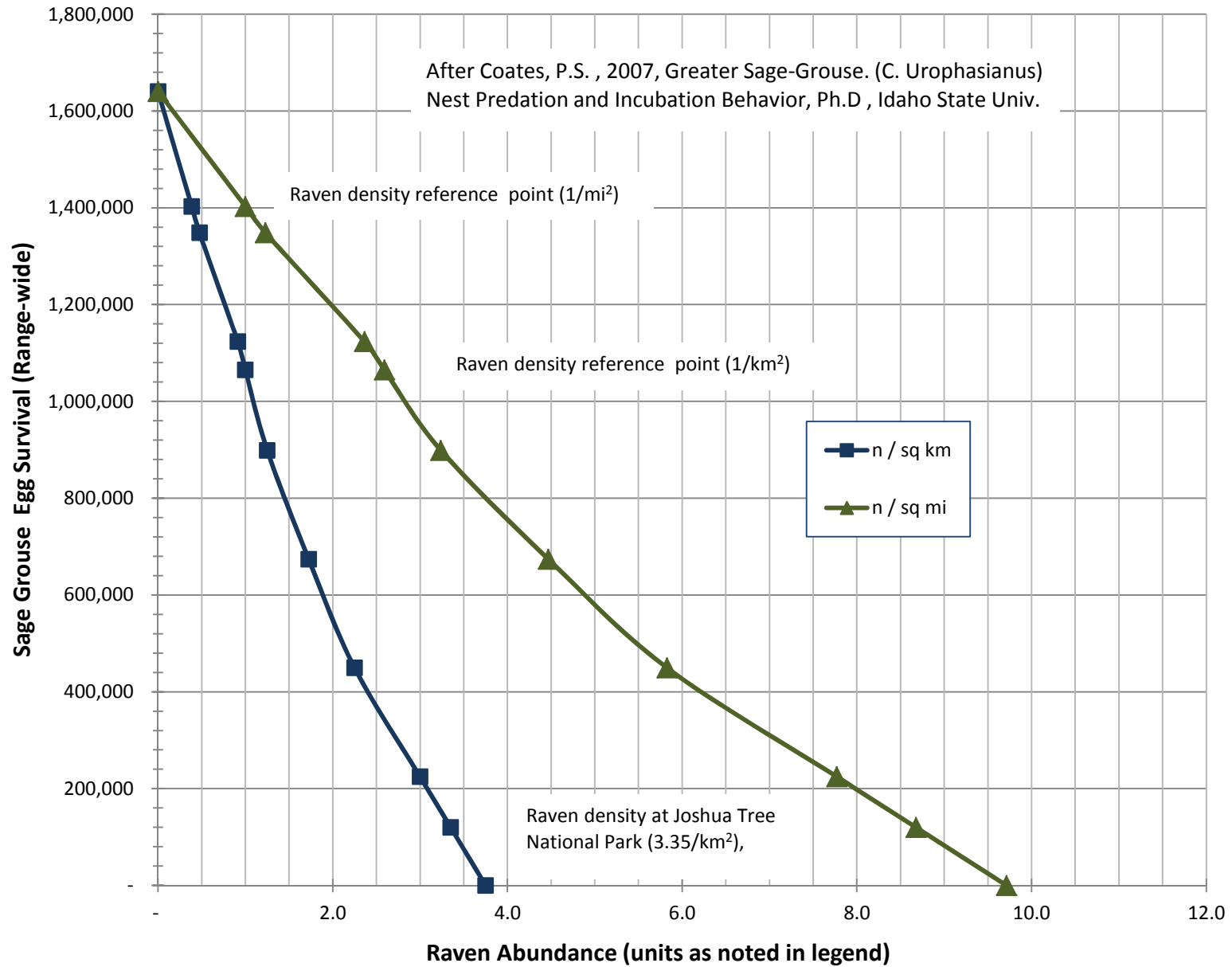
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### Sage Grouse Egg Survival vs. Raven Abundance



## Sage Grouse Egg Survival vs. Raven Abundance



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## Finding Fractures

The Mary's River Master Drilling Plan presented by Noble Energy comprehensively and prudently approaches natural gas exploration within the target area. The planned drilling depths range from 7,000 to 14,000 ft. The surface area is approximately 62 square miles, with about 25 square miles on private land. Surface disturbance will be up to twenty well pads of approximately five acres each. The first year calls for drilling four wells, which guide the subsequent sixteen in following years. The overall plan calls for upgrading 28 miles of existing roads, with a possible ten miles of new roads. Elko County covers 17,180 square miles with approximately 1,000 miles of County Roads.

Using Instruction Memorandum 2012-043, an administrative instrument which among other things allows the agency to evade public input, the BLM has informed Noble of severe restrictions on an exploration campaign which impacts less than 0.4% of the county area and only 3% of the county roads. These restrictions, ostensibly to benefit sage grouse, are onerous enough that the exploration on public land may be abandoned. Is Noble evaluating whether that drives the entire project below sufficient expected information gain? Expected returns must warrant drilling costs ranging from \$1-5M per hole, with an additional \$150,000 for each hydraulic fracturing treatment.

Regarding local commercial impact, if average drilling time for each of the twenty holes is fifty days, two crews per hole indicate a potential of more than 2,000 crew days in motels, apartments or RV parks. Though four or more experienced hands will be needed for each crew, an equal number could be hired locally. Services such as food and fuel will be local.

Water requirements are a concern at up to 15 acre-feet per hole, but re-use and recycling the solutions diminish the total makeup amounts. The Association of American State Geologists has never found a case of fracking solutions moving up into fresh groundwater. In 2005, Nevada municipal and agricultural water use was 377,000 and 1.6 M ac-ft, respectively.

In a related matter, Wells Rural Electric is faced with new sage-grouse-friendly installation costs approximately 40% higher than recent transmission lines.

Makes one think about the Keystone XL pipeline. The administration halted it since apparently the 850 miles within the US are too great an environmental impact. Yet the existing 180,000 environmentally-compliant pipeline miles are never mentioned by agencies.

Rather than their procedural embrace of political science might agencies consider cooperation rather than expulsion? Running ranching and energy development off the land eliminates the



best stewards of the land. In both presence and wealth, producers routinely have done more for wildlife than all the central planners. The greatest difficulty is their receiving permission to resume past practices which actually produced the greatest documented wildlife populations.

Finally, while aggressively obstructing energy exploration and transportation on agency-administered land, the Executive Branch is accelerating drilling in the Gulf of Mexico by Chinese firms – apparently to reward campaign supporters through windfalls in their Nexen investments. It seems exploring Presidential practices discovers potential heavy crude fascism.

Respectfully,

Ralph R. Sacrison

May 14, 2013

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## **Much goes up in smoke**

Seasons change and new regulatory growth is apparent across the land. Snowpack, rivers, and reservoirs all are low, and in much of the Great Basin drought continues. The sad and expected response of the federal agencies is to institute draconian drought control measures.

The National Center for Ecological Analysis and Synthesis determined that from 2000 to 2009, cheatgrass fueled close to 80 percent of the largest fires across the west. Perhaps a drought cycle is the best opportunity to graze down as much cheatgrass as possible. Yet the Bureau of Land Management restricts grazing, to the point of closure orders such as at the Badger Ranch near Battle Mountain.

Grazing restrictions enhance the fuel supply which in turn helps sustain the federal fire-fighting machine desired by the bureaucrats. Isn't it time to prevent fires rather than cynically seek the herculean ability to fight them? Allow loggers rather than government biologists to steward the forests, and ranchers rather than government landscapers to steward the range. Had we done so, we would have more spotted owls and healthier forests. If we do so, we will increase sage hen population and improve their habitat.

Among the fire damage glossed over by agencies are astonishing increases in pollution due to ground-level ozone and carbon monoxide, along with mercury and particulates. The ground-level ozone pollution experienced in wildfire plumes is three times more likely to exceed safe levels than from other causes. Wildfires have been estimated by the National Center for Atmospheric Research to produce more carbon monoxide than all human sources such as manufacturing and transportation. Annually wildfires produce nearly twenty times more mercury pollution than all coal-fired power plants. Satellite photos of firestorm plumes show smoke overwhelming that created by all industrial and domestic sources.

These firestorms have occurred with deadly regularity in recent decades, with the 2012 fire season consuming more than 3.6 million acres of forest and shrubland. All under agency directives to restrict logging and ranching and close roads. In addition to pollution, research indicates vertebrate loss may be on the order of three per acre in these fires. Agencies discount and accept this wildlife loss as incidental.

Not incidentally, national wildfire suppression costs in 2004 were approximately \$2.4B. By 2010, that had risen to \$3.4B. These costs were completely separate from the enacted budgets, which for 2010 were \$1.3B and \$6.2B for the BLM and Forest Service, respectively.

The respective 2013 budgets are \$1.3B and \$4.9B for the BLM and FS, and agency maintenance of fuel loads may contribute to this year's impending off-budget wildfire suppression costs.

There is minimal administrative incentive to prevent fires, because fire fulfills the prime directive of enlarging the agencies. There is every administrative incentive to increase the infrastructure, personnel and fleets required to fight the firestorms. The bureaucracy needs wildfire much like wildfire needs cheatgrass and decadent timber. Within the vision statement of the Wildland Fire Leadership Council is the image 'live with wildland fire.' The taxpayer perceives the Council agencies live large.

Respectfully,

Ralph R. Sacrison

June 10, 2013

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