
To: REAT

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Comments to REAT regarding the draft DRECP [DRECP NEPA/CEQA]

Introduction. In addition to submitting this present comment letter I have also signed onto another DRECP comment letter, a joint comment letter, to the REAT, and that letter calls for what is termed the "California Energy Efficiency Strategic Plan (CEESP) Alternative" to be incorporated into the DRECP. The CEESP is a point-of-use solar alternative, developed by the California Public Utilities Commission and investor-owned utilities. The CEESP Alternative focuses on distributed generation, energy efficiency, and the siting of renewable energy on degraded land/brownfield sites adjacent to existing transmission lines. That comment letter was developed by Kevin Emmerich and Laura Cunningham of Basin and Range Watch. In case it is needed for legal purposes, I hereby incorporate that letter by reference into this letter.

In what follows, I refer to that alternative simply as the "CEESP Alternative", and I focus here primarily on additional issues, some of them incorporating elements of the CEESP Alternative.

This present letter at hand addresses

(1) major, broad structural issues of the DRECP, and

(2) the possibility that the REAT may not be entirely convinced that the CEESP Alternative can and should completely take over the job that desert utility-scale energy development is intended to do, and

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(3) several other issues;

Major assumptions: The following are major assumptions that are widely regarded as basic truths and are likely without dispute even within the REAT:

(1) Desert utility-scale energy development, far more than measures (such as rooftop solar) called for in a properly designed CEESP Alternative, does indeed create substantial, undesirable negative impacts to the desert and also creates substantial costs to government, ratepayers, and the general public, especially where such desert utility-scale energy development involves public lands; and thus

(2) It is in the public interest to shift as much planned energy generation as possible from desert utility-scale energy development to measures called for in the CEESP Alternative;

Dynamic sizing of Development Focus Areas (DFAs). Dynamic sizing of the DFAs should be planned in "dynamic decision-making" (aka "adaptive management") fashion, so that the DFAs can start out small for the best conservation purposes by avoiding impacts to the more sensitive lands and yet DFAs can be made as large as needed in adaptive-management fashion if it turns out later that actual market demand requires it.

This dynamic-sizing approach satisfies two major objectives:

On the one hand, DFAs start out small and thus have an improved probability of reducing impacts to the more sensitive areas of the desert simply because DFAs are likely to stay small if actual market demand for desert utility-scale generation is significantly less than currently assumed and estimated in the fixed-for-all-time, one-size-fits-all approach that is taken in the draft DRECP. The dynamic-resizing approach provides an excellent chance for the DFAs to remain no larger than needed, thereby reducing unnecessary impacts.

On the other hand, if actual market demand later requires larger DFAs, DFA sizes can be increased in adaptive-management fashion, so that adequate sizing of DFAs is available if and when the need actually materializes.

Thus, this dynamic-resizing approach avoids making unnecessary, extremely controversial assumptions about the total level of need for desert utility-scale generation.

Market-driven competition between measures in the CEESP Alternative, especially rooftop solar, on the one hand, and desert utility-scale generation, on the other. Measures in the CEESP Alternative, especially rooftop solar, should be incorporated into the DRECP so that such measures are both (1) incentivized, to promote rapid growth of the industry, and (2) in competition with desert utility-scale generation. Evidently, a central idea or concern of the draft DRECP is that the level of energy development in the desert should be market-driven and not driven by REAT policy. My suggestion here responds to that concern by properly including measures of the CEESP Alternative as part of the market dynamics to be considered.

Dynamic sizing of DFAs, measures from the CEESP Alternative, and these market-driven considerations all further improve conservation values. This idea provides for as much desert utility-scale development as needed, yet it allows CEESP measures to prove themselves and to prove (to *all* doubters) that desert utility-scale development is much less needed than some people have estimated. The point here is that needless inflexibility based on dubious presumptions can and should be avoided in the DRECP.

Some aspect of the CEESP Alternative, especially rooftop solar, should be in every one of the action alternatives.

This is so ...

because, as argued elsewhere, measures in the CEESP Alternative, especially rooftop solar, should properly be a part of the DRECP and

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because such measures are at least as important as desert utility-scale generation, and probably much more so, for meeting the state's renewable-energy objectives and

because desert utility-scale generation is already a central focus in every one of the draft DRECP action alternatives and

because measures in the the CEESP Alternative deserve at least equal billing and consideration relative to desert utility-scale generation.

In what follows, "***ES***" refers to the DRECP ***Executive Summary***.

Please extend the comment deadline another 90 days. The DRECP document is horrendously huge, and there is no way most people can do an adequate job of studying it by February 23. In fact, I have serious doubts that even a person who undertakes a full-time effort to review the document and who is already well versed on the subject matter could do an adequate job of review.

There is a glaring flaw in the exclusion of distributed energy from the active alternatives. The draft DRECP considers "***the*** Distributed Generation Alternative" and appears to presume that it is an exclusive alternative, totally incompatible with utility-scale generation.

Almost immediately, on page II.8-6 under the heading "II.8.2.1 Distributed Generation Alternative", the discussion acknowledges "A number of comments were received during the public scoping period suggesting that the agencies evaluate renewable distributed generation as opposed to, or ***in addition to***, the development of centralized, utility-scale renewable energy facilities." (My emphasis added.)

At this point the draft DRECP has essentially acknowledged that distributed generation ***in conjunction with*** utility-scale generation is a potential alternative properly within the "range" of potential alternatives for initial consideration.
(cf. CEQ "Forty Most Asked Questions ..." [http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf] *1a*. *Range of Alternatives*.)

Then the discussion goes into a laundry list of issues with distributed generation. However, a similar laundry list describing a much worse series of problems for utility-scale generation can also be drawn up.

So that laundry list in that section appears to be basically irrelevant to the rationale for excluding distributed generation. This is even more so since skillful management should be able to overcome actual problems with distributed generation. (But in any case, the major flaw in the argument comes next.)

Immediately after the above-described discussion, in the subsection "Consistency with Purpose and Need and Objectives", there is suddenly the idea of "***the*** Distributed Generation Alternative" placed into consideration to be argued against and summarily dismissed.

If you take the phrase "***the*** Distributed Generation Alternative" wherever it occurs in that and the subsequent subsection and replace it with the phrase "an appropriate alternative involving both distributed generation and utility-scale generation", practically all the operative statements with this phrase become false and the entire argument falls apart.

In particular, in the subsection "Rationale for Elimination", the critical supposition

> the Distributed Generation Alternative conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies

in the statement

> Because the Distributed Generation Alternative conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies, the alternative did not advance for further analysis.

becomes patently false when the above-indicated substitution of phrases is made.

Moreover, an appropriate alternative involving both distributed generation and utility-scale generation would not only be consistent with but would also substantially support and further both the DRECP goals and the purpose and need and objectives of each of the REAT agencies.

In other words, the draft DRECP discussion argues against "*the* Distributed Generation Alternative" but it ***completely fails to consider alternatives involving both distributed generation and utility-scale generation even though such alternatives are properly within the "range" of alternatives the DRECP must consider***.

Measures of the CEESP Alternative -- including efficiency measures and rooftop solar in cities -- are an extremely viable option for meeting the state's energy goals, but they also need more incentive and encouragement. Implementation of a DRECP action alternative involving CEESP measures can substantially result in useful, revised estimates for DRECP energy planning in adaptive-management fashion, and, therefore, *such a DRECP action alternative involving CEESP measures is intimately tied to appropriate planning of DFA-sizing for utility-scale energy development*. *Consequently, proper consideration of CEESP measures needs to be included in the plan*.

Federal agencies are required under NEPA to consider alternatives outside of their normal areas of doing business when those alternatives can offer substantial satisfaction of the plan's objectives. The fact that most of the partner agencies don't normally conduct their business in cities is not a valid excuse under NEPA law.

(CEQ "Forty Most Asked Questions ..." [http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf] *2b*. "*An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable*.")

Moreover, California's overall goal of increasing renewable energy generation capacity -- that goal being the driving force behind the DRECP -- is implicitly an integral part of the purpose and need to plan for desert conservation and desert utility-scale renewable energy development. And thus that overall goal cannot be severed from the purpose and need to plan for desert conservation and utility-scale energy development. (But in any case, the letter I signed onto promoting the CEESP Alternative argues for an appropriate reformulation of the DRECP's concept of purpose and need.) Distributed generation and other CEESP measures also serve that purpose and need and are intimately tied to proper planning for desert utility-scale energy development and conservation. For further details see subsequent discussion in this letter at hand concerning estimates of needed energy development vis-a-vis DFA sizing.

Additionally, the DRECP should **incorporate incentives in every action alternative to promote rooftop solar in cities**. This is true even if Congress has not already authorized, or budgeted for, some elements of the alternatives.
(CEQ "Forty Most Asked Questions ..." [http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf] *2b*. "*Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies*.")

More specifically, assuming desert utility-scale generation is not eliminated by governmental processes as outright inappropriate, the market should be allowed within the DRECP framework to chose between CEESP measures on the one hand and utility-scale generation on the other, and the REAT and/or Congress should provide incentives for rooftop solar since rooftop solar is obviously the preferred approach to energy-generation over utility-scale generation

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-- to the extent technically and economically feasible -- and since rooftop solar is still in need of incentives for rapid growth.

The Executive Summary's introduction improperly emphasizes desert energy resources over distributed energy resources *so as to actively promote* desert utility-scale generation over rooftop solar in a highly biased fashion, and that improper emphasis very badly skews the considerations and perspectives included in the DRECP. Specifically, the executive summary says in its introduction that the California desert "has an abundance of some of the best solar, wind, and geothermal resources in the nation." But it fails to also say that rooftops in cities also have an abundance of some of the best solar resources in the nation. By failing to include rooftops in cities in the available resources, the DRECP fails to give proper consideration to rooftop solar for inclusion in the action alternatives, and the stage is thus set for improperly promoting desert utility-scale generation over rooftop solar and other CEESP measures.

The fact that the Executive Summary states that the BLM intends to "[p]romote renewable energy and transmission development" (ES, p.11), with "transmission development" tightly juxtaposed with "renewable energy", clearly indicates that the agencies are thinking only of utility-scale development and intend to ignore the potential of distributed energy generation for DRECP planning purposes. This bias and exclusive focus on utility-scale energy development is further reinforced repeatedly in the Executive Summary by similar such phrases as "renewable energy generation and associated transmission capacity", where "transmission capacity" is tightly juxtaposed with "renewable energy generation".

This focus on utility-scale generation would not be so bad if the intent were merely to ***allow for*** appropriate utility-scale generation development, but the draft DRECP uses language to ***actively promote*** utility-scale generation development, and that fact is problematical because, among other things, it is counter to the idea of allowing the level of utility-scale generation to be market-driven and it is also counter to the obvious fact that CEESP measures

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are clearly preferred in the public interest to the extent that they are technically and economically feasible.

A major problem with the 20,000 megawatts "goal" (ES, p.14) used as a basis for planning is that the "goal" (better termed an "estimate") is used in a single, lumped fashion to ***unnecessarily*** **open large areas of sensitive desert landscape to renewable energy development**. Instead, the **DFAs should be defined in adaptive management fashion** (to use CEQ terminology) to allow development initially on only the very least sensitive areas of the desert.

Thus, an initial estimate of, say, 5,000 megawatts of needed, market-driven utility-scale energy development could be used. Then if it turns out that more market-driven utility-scale energy development is needed based on market conditions, the DFAs can then be enlarged based on the new (market-based) estimates of needed energy development; that is, the new estimate would be based on the actual market for utility-scale energy development at the time the adjusted estimate is needed and not fixed in the initial programmatic phase of the DRECP for all time.

Thus, in this phased fashion, only the least sensitive areas of the desert need to be sacrificed. This will tend to guarantee that the least sensitive areas will be sacrificed before the more sensitive areas, and so it is more likely that the more sensitive areas will be saved from impacts. In this way, the initial estimate, of say 5,000 megawatts, does not restrict the eventual amount of utility-scale energy development, and moreover, the DFAs are not made unnecessarily large so as to cause unnecessary sacrifice to the more precious areas of the desert.

Thus, both objectives are satisfied: the plan will allow for as much market-driven energy development as needed and yet will also preserve the more precious areas from unnecessary impacts. And this will be done much better than can be done with a single energy-need estimate fixed in the plan for all time as presently formulated.

This suggestion amounts to a kind of adaptive management (also called "dynamic decision-making"), but it should not be confused with the seemingly rather complicated and

abstract -- and perhaps therefore rather specious -- project-specific adaptive-management planning already in the DRECP.

The adaptive management proposed here for DFA-sizing is at the level of macro-management rather than at the complicated, project-specific, micro-management level that seems to be contemplated already in the draft DRECP and that apparently is based on such things as resource monitoring (including, for example, biological & cultural resources & unforeseen habitat changes), implementation monitoring, effectiveness monitoring, technology monitoring, and mitigation monitoring.

What is to be monitored for this adaptive management for DFA-sizing is the actual level of renewable energy facility development implemented, including not only actual utility-scale energy development in the desert, but also actual state-wide efficiency measures and distributed energy generation development, which greatly impacts any supposed need and/or estimated market demand for additional utility-scale energy development in the desert. Specifically, any revised estimates of total energy capacity needed (e.g., California state energy objectives) as well as actual, cumulative energy capacity developed should be a part of the monitoring.

The conservation (and other) objectives to be achieved by this DFA-sizing, adaptive-management suggestion are the avoidance of unnecessary impacts to the more sensitive areas of the desert that would be impacted under the one-size-fits-all approach presently contemplated in the DRECP.

Of course, there is still needed a decision as to what criteria will be used for DFA resizing and by how much DFAs will be resized and potentially how often. And these decision factors still need to be reviewed in this DRECP programmatic phase (or perhaps in new, individual NEPA reviews as the need arises, especially if reshaping of the

DFAs would occur in ways not anticipated in this programmatic phase).

These decision elements can be proposed in a supplement to this draft programmatic phase.

Upper limit to DFA sizes. An upper limit to DFA sizes needs to be determined in the DRECP's programmatic phase. This may perhaps be accomplished via use of an updated, revised version of the DRECP "acreage calculator", say to provide a revision of the 20,000 MW estimate of maximum energy need currently contemplated in the draft DRECP and of the resulting estimate of maximum acreage needed. Such an upper limit is not strictly essential to the basic idea of DFA-sizing adaptive-management, but it does seem strongly advisable in order to provide for additional, critical NEPA public review in case the REAT's new estimates for DFA resizing become larger than previously anticipated.

I have not had time to study accuracy issues of the calculator, but I understand from others that there are major concerns as to the calculator's accuracy and as to the assumptions used in its design and implementation. I understand that other commenters are likely to address the need for updating both the accuracy and the built-in assumptions use for the calculator.

Issues with the planning rationale:

There is an extremely bad presumption in the statement:

> However, the consequences of underestimating the need for renewable energy in the Plan Area may be greater than the consequences of overestimating the need." (ES, p.16)

The plain fact is that it is relatively easy to revise the estimate upward if need be, but it is virtually impossible to revise it downward in hindsight to recover precious

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natural areas intact that have already been destroyed by development due to a foolhardy (and needless) overestimate.

The claim:

> If energy and economic variables, governmental requirements, and other factors translate into a need for more or less development, the DRECP will still achieve its intended purposes of reducing project impacts and conserving sensitive species and habitats. (ES, p.16)

patently amounts to a gross, false promise and presumption as compared to the optimization that could be achieved by an adaptive-management approach to levels of energy development and DFA sizing as discussed above. While the quoted statement may be technically "correct" to some degree, it is quite misleading because a far better level of optimization can be achieved using an adaptive management approach for DFA sizing. No one should be lulled into thinking that the quoted statement adequately exemplifies good conservation planning.

The glaring flaw in the discussion (ES, p.16) is that the planning is conceived of as being based on a single, fixed energy estimate for all time without considering the optimization that can be achieved by using flexible planning in an adaptive-management fashion for estimates of energy need and DFA acreage.

The difficulty indicated by the statement:

> If the DRECP plans for less renewable energy development than is ultimately needed, developers might seek to build renewable energy projects outside of areas identified for development, at a higher financial and environmental cost than development under the Plan. Increased costs for renewable energy development could in turn

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> jeopardize the state’s ability to meet renewable energy and climate goals. (ES, p.16)

is that, not only is the statement highly speculative, but also the DRECP needs to provide stronger incentives for planned development to stay within the DFAs so that the suggested problem does not arise. And moreover, the DRECP should provide for a preliminary review process so that an energy developer can, in non-binding fashion, gauge the likelihood of eventual success of a proposed site outside a DFA without incurring unnecessary costs associated with preliminary aspects of energy development siting. Also, the REAT should have done a good job of vetting such potential exceptions in advance of the draft DRECP review. If they have not, a revised, new draft or supplement needs to be prepared for an additional stage of public review.

The intended idea conveyed by the statement:

> In contrast, if the DRECP plans for more renewable energy development than is needed, then there will simply be less development than predicted. (ES, p.16)

is patently false. The intended idea I refer to is that there is no harm done by "the DRECP [planning] for more renewable energy development than is needed". That this idea is false has been covered by previous comments above.

It is important to note that the needed adjustments to the plan as suggested above do not absolve us from considering whether the overall plan still encourages too much of an overall impact to the natural areas of the desert. There is still the very serious question: Is the resulting utility-scale development still too much, ill-advised, and/or otherwise unnecessary, even if conservation-enhancing, adaptive-management DFA-resizing is implemented?

There is very serious opinion to the effect that the relevant energy-generation technology is changing extremely

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rapidly and that utility-scale development will only be very unnecessarily costly and will become quite obsolete in an extremely short period of time. Estimates in this regard which the DRECP planning is based on are likely already way out of date.

There is **another problem with the 20,000 megawatts "goal"**, and that is that, even though the DRECP video and the BLM's Joshua Tree presentation (and perhaps the DRECP itself somewhere in its voluminous pages) used language that strenuously insists this "goal" is not a "target" and that energy development will be entirely market-driven, that "goal" is still referred to quite ambiguously and confusingly in the draft DRECP as a "goal" and not as an "estimate". This ambiguity and confusion occurs not only because the words "goal" and "target" are generally synonymous in the English language in a context such as this, but also because of the frequent use of language that the DRECP intends to "promote" energy development in the desert.

So the above-mentioned claim that the "goal" is not a "target" appears to be quite a confusing and disingenuous claim, and perhaps a completely false and/or vacuous one at that, depending on REAT intentions. If the DRECP honestly intends for the 20,000 megawatts "goal" to be an estimated, projected, likely upper limit for energy development driven only by the market and not by the REAT, the DRECP should say so consistently and refrain from falling into the prejudicial language of calling it a "goal".

In fact, it appears likely that the REAT has fallen into the trap of confusing the 20,000 megawatt estimate for DRECP planning purposes with Governor Brown's proclamation that 20,000 megawatts is a goal for energy development. One questions whether that confusion is a deliberate attempt at obfuscation for political ends.

Although **the DRECP** considers conservation for important or threatened species, it **fails to consider and include substantial conservation areas for humans, specifically for**

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natural viewsheds that are vital to the human spirit; this especially includes viewshed along the interstate highways and other roads and highways meandering in or passing through the desert. Viewsheds along roads and highways should allow for sublime serenity, encouraging cumulatively far fewer heart attacks and accidents per mile than what would result from the chaotic, congested viewshed caused by industrial-scale development. Extremely serious thought must be given regarding the **tendency of civilization to accept creeping ugliness and destroyed natural areas and destroyed habitat over the years as the new normal**; such a tendency by progressive stages can soon destroy all natural areas and habitat so than nothing is left of them, so that nothing remains but ugly concrete and steel, which will become even uglier as they rust and fall into disrepair.

Of course, such advocated conservation areas for humans, specifically viewsheds, also have the concomitant advantage of conventional biological habitat conservation.

It is far worse to spread out energy development projects across the landscape than it is to concentrate them all close together in a few highly concentrated pockets of development. In the overall scheme of energy development, energy development projects are not military targets that become more vulnerable by being concentrated together. There are already enough different DFA localities to alleviate any significant concerns about problems due to concentration in the face of potential natural or man-made disasters. On the other hand, energy development projects spread out over the landscape tend to destroy huge areas of viewshed. Even if the viewsheds may not be already entirely natural, they can offer a relative degree of naturalness to the eye if they are only very minimally impacted already.

Thus, **there is no reason to have large DFAs**. The total DFA acreage allocations should be no larger than suggested for Alternative 1, namely 1,070,000 acres. And very likely they should be even substantially smaller in accordance with an optimal, phased, adaptive-management approach to

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DFA sizing, based on actual cumulative energy generation development at any given point in time.

On the other hand, it is extremely difficult to undo poor conservation planning to attempt to return the landscape back to the pristine or near-pristine conditions that exited before development impacts were permitted and undertaken. So for conservation purposes, the land allocated to conservation should be the largest possible, perhaps with progressive phasing to smaller areas as energy development advances. But it is essential that the process begin with the largest allocations for conservation because the process of permitting impacts cannot be undone. Thus, for the purposes of conservation acreage allocation, it is far, far better to err on the side of excess than to err on the side skimping.

Consequently, as an initial selection, subject perhaps to some adjustments, the largest acreage among the alternatives should be selected as the chosen acreage for each of the conservation categories, namely as follows:

National Landscape Conservation System lands...5,124,000 acres (from Alternative 2)

Areas of Critical Environmental Concern.....3,609,000 acres (from Alternative 1)

Wildlife Allocation.....799,000 acres (from Alternative 1)

Conservation Planning Areas.....1,287,000 acres (from Alternative 1)

(cf. ES, Table 7, p.40)

Contrary to what is suggested by the flowchart on p.24 of the ES under "PRE-SITING AND DESIGN PHASE (DUE DILIGENCE)", a project should not be streamlined if an associated transmission project is "identified in the DRECP" but the proposed energy generation site is not within a DFA. (In

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other words, the use of "and/or" in the flowchart seems to be in error and/or quite misleading.)

Even though the flowchart on p.24 mentions "CEQA/NEPA Review" in the "APPLICATION REVIEW" box, **the fact that public participation in the review process is not explicitly mentioned is troubling** because that absence suggests that the partner agencies intend to slight public participation in the review process, perhaps, say, by announcing extremely short periods for public comment and maybe even omitting the draft review stage if NEPA would allow it. Some people have indicated alarming evidence (in Nevada BLM decision-making) suggesting that, for "streamlining", the REAT may try to use Environmental Assessments rather than EIS/EIRs for public review of projects in DFAs. **The intent to provide for good public review for projects in the DFAs should be made more explicit**.

Development Focus Areas (DFAs) which are surrounded by conservation areas and are not adjacent to existing transmission lines with substantial, existing, unused capacity should be removed from the plan since otherwise new transmission lines would cut through such conservation areas and make a mockery of the intent of the conservation areas. This consideration applies also to the proposed DFA on the California/Nevada border since energy generation in that area would very likely require transmission lines to cut not only through such conservation areas but also rather long distances across the desert to serve California. This issue is especially urgent since transmission lines outside of DFAs are planned to receive "streamlined review" (ES, Sec. 2.3, p.17) Once started in the very earliest stages of planning, there will likely be, because of the onslaught of political momentum, no stopping a transmission-line from cutting across the public's favorite conservation areas and viewsheds. **So such grave misfortunes need to be eliminated at this programmatic stage in the DRECP**.

And certainly, **transmission projects outside of DFAs should not be streamlined.** In fact, perhaps special, linear, transmission DFAs/corridors should also considered and reviewed in this programmatic phase of the DRECP. It seems that **such special transmission DFAs/corridors are absolutely necessary *if* *any* transmission projects are to be streamlined; it is also absolutely necessary that such streamlining should occur only for transmission lines within such transmission DFAs/corridors**.

The streamlining of transmission-line projects wherever they occur as now proposed in the draft DRECP, in effect, makes the entire desert into a transmission-line DFA, and that idea seems horrendously unacceptable.

Beyond the comments above I also urge that energy projects in the Development Focus Areas (DFAs) should not be streamlined; full review should be provided for any development.

Furthermore, **streamlining of Endangered Species protection in DFAs should not be permitted**.

In particular, **no golden eagle take permits should be allowed through DRECP**.

More consideration needs to be given in regard to wildlife corridors. I've gotten the impression from scientists working on this issue that comments presented to the government agencies on this subject tend to go in one ear and out the other. There is apparently substantial science behind the concerns about wildlife corridors. That science needs to be heeded.