



Fiscal Year 2020
Cochise, Pima, Santa Cruz Counties Border Barrier Projects
Stakeholder Feedback Report

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1. Introduction and Background

U.S. Customs and Border Protection (CBP), with the assistance of the Department of Defense pursuant to 10 U.S.C. § 284, is constructing new steel bollard fencing and replacing existing barrier, with new steel bollard wall in Cochise, Pima, and Santa Cruz counties, Arizona. The barrier projects total approximately 75 miles. The project also includes the installation of a linear ground detection system, road construction or refurbishment, and the installation of a lighting and camera surveillance system supported by grid power.

As part of the planning process for the Cochise, Pima, and Santa Cruz counties border barrier project, CBP sought input from the public and other stakeholders on potential impacts to the environment, culture, commerce, and quality of life, including socioeconomic impacts. This input will be used to inform the development of an Environmental Stewardship Plan (ESP). It will also inform project planning and execution.

1.1 About Environmental Stewardship Plans

On March 16, 2020, the Secretary of Homeland Security determined that it was necessary to waive certain laws in order to expedite the construction of border infrastructure in areas of high illegal entry to deter illegal crossing of people and prevent drug smuggling into the United States.

The waiver includes various environmental, natural resource, and land management laws, including the National Environmental Policy Act and the Endangered Species Act. The Secretary of Homeland Security's waiver authority is set out in section 102(c) of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, as amended ("IIRIRA").

Though certain laws have been waived, the Department of Homeland Security (DHS) remains committed to environmental and cultural stewardship. One of the ways CBP honors this commitment is through the development of the ESP, which, among other things, identifies potential impacts and outlines construction Best Management Practices (BMPs) to eliminate or minimize environmental impacts to the greatest extent possible.

1.2 Purpose of this Report

The purpose of this report is to summarize the input received during the public comment process in order to provide stakeholders and the public transparency into the environmental, cultural, and socioeconomic issues that will be considered during the development of the ESP. It does not present individual comments received or provide responses to the comments.

2. Public Input Process

From March 16, 2020 to May 15, 2020, input was collected regarding the potential impacts to the environment, culture, commerce, and quality of life, including socioeconomic impacts.



CBP sent informational materials to federal, state, and local agencies, landowners, environmental non-governmental organizations, local tribes, and educational institutions and solicited input on potential impacts. CBP also solicited input from the general public. The notification and informational materials are included as an appendix to this report.

Comments were collected through email and mail. In addition, CBP staff held virtual site visits, webinars, and phone meetings with landowners, environmental experts, tribal leaders, and other stakeholders. CBP staff plan to continue meeting with impacted stakeholders and knowledgeable individuals throughout the process to ensure environmental impacts are eliminated or minimized.

2.1 Public Feedback Review

All comments received by CBP have been reviewed and categorized. CBP received a total of 6,923 comments during the comment period. There were 642 comments identified as unique. The remaining comments were determined to be form letters. As the comments were received, they were reviewed and categorized by their primary topic of concern: environmental, economic, cultural, or quality of life. If a comment included substantive information on multiple topics, they were included in each relevant category.

The Infrastructure Portfolio outreach team reviewed all comments received during the comment period, responded to comments as appropriate, and prepared this report to summarize public input. The comment review was conducted based on explicit concerns; comments that were not specific or contained vague statements were not interpreted by the reviewers. Comments that provided substantive information were further assessed by CBP, often contacting that specific stakeholder to address specific questions or concerns. In some instances, the Infrastructure Portfolio outreach team contacted specific stakeholders to determine the validity of data provided for use in the assessment of environmental impacts.

As a next step, CBP will develop an ESP that will utilize existing and new environmental field survey data, as well as incorporate relevant information and data obtained from the public feedback process.

3. Summary of Public Feedback

The following summarizes CBP's review of the input provided by the public during the comment period. CBP identified 14 categories for the feedback it received from the public.

3.1 Border Security

A total of 40 comments were about border security; 35 of those comments were in support of the border barrier projects. Several comments provided data or stated that existing border security strategies have proven effective and new infrastructure is not needed.



Some comments suggested that high levels of illegal activities, such as the transportation of illegal narcotics, could be deterred by development of a border barrier.

3.2 Crime/Drugs

A total of 17 comments mentioned drug trafficking and crime as a consideration for barrier construction. Of the 17 comments, 11 were in favor of barrier construction. Commenters expressed specific concerns about increased crime in border communities, including burglary and trespassing. Others were concerned about the illegal transfer of drugs and people across the border.

3.3 Cost

There were 141 comments regarding the cost of the projects. The majority of comments suggested that the potential benefits did not justify the cost to taxpayers or stated it was a waste of resources. A couple of the comments also suggested diverting resources from the wall to COVID-19 pandemic support and relief.

3.4 Ecosystem/Environment

A total of 162 comments concerned the projects' impacts to the environment and ecosystem. Commenters expressed concerns about the impact of barrier construction on Arizona's unique and diverse desert ecosystems. A total of 42 comments specifically mentioned the Sky Island mountain ecosystems. Commenters also expressed concerns about the Buenos Aires National Wildlife Refuge, Coronado National Monument, Coronado National Forest, and Cabeza Prieta National Wildlife Refuge.

3.5 Landscape/Views/Visual Impacts

A total of 267 comments expressed concerns about the potential impact to the landscape and the obstruction of views as a result of a barrier being built. Commenters stated that a barrier would damage the beauty of the natural landscape. A total of 196 comments were specifically concerned about the impact the proposed two-mile barrier in the Coronado National Memorial will have on the Arizona Trail. The Arizona Trail is a popular tourist destination and many comments expressed concerns about impacts to the user experience.

3.6 Lighting/Light Pollution

A total of 60 comments discussed the impacts of artificial lighting. Comments stated that artificial lights inhibit wildlife movement for some species and could cause other flying species to collide with the fence or become disoriented. A few comments also expressed concerns about the effect of light pollution on Arizona's dark sky zones and International Dark Sky Communities.



3.7 Impacts to Landowners and Local Businesses

A total of 15 comments mentioned potential impacts to landowners and local businesses. Some of these provided recommendations for border barrier construction, including ways to prevent disturbance to cattle operations. A few comments stated that flooding is an important issue to consider during barrier design and construction.

3.8 Historic and Cultural Preservation

A total of 87 comments focused on preserving cultural and historic resources in and near the project area, including tribal resources. Most of the comments opposed construction due to the possibility of damage to cultural, historic or archaeological sites, or the disturbance of remains, particularly those of the Tohono O'odham Nation's ancestral lineage. Some commenters also expressed concerns about impacts to the Hopi Tribe, as well as impacts to Rancho de la Osa and Quitobaquito Springs.

3.9 Economic/Tourism Impact

A total of 118 comments stated that barrier construction will negatively impact the local economy, especially the recreation and tourism industry. Some of these comments mentioned the Arizona Trail as a major contributor to the local economy.

3.10 Water/Flooding

A total of 85 comments mentioned water or flooding concerns. Many comments stated water access is essential to maintain habitat for sensitive animal and plant species in the region. Several comments expressed concerns over groundwater use and aquifer drawdown. Some commenters expressed concern that the proposed border barrier could block natural water flow and cause flooding, especially in the San Pedro riparian area. A few landowners were also concerned about potential flood damage to their property.

Multiple federal and state resource agencies submitted recommendations and suggestions to maintain the integrity of streams and aquatic habitats in and near the project area.

3.11 Wildlife/Plant Life

There were 296 comments submitted regarding the impact of the projects on animal and plant species. Of those, 272 comments were opposed to barrier construction, stating the project would have a negative impact on wildlife, particularly on wildlife corridors and migration. A total of 114 comments mentioned the jaguar, whose habitat transverses the border between Arizona and Mexico.

A number of federal, state, and local agencies submitted comments and BMPs to best maintain species habitat, particularly for the following species: yellow-billed cuckoo, jaguar, ocelot, Mexican gray wolf, Chiricahua leopard frog, Sonoran tiger salamander, Mexican spotted owl, Huachuca water umbel, Southwestern willow flycatcher, beardless chinch weed, Pima pineapple cactus, Cochise pincushion cactus, and the northern Mexican gartersnake.



3.12 Public Health

A total of 133 comments mentioned public health concerns, specifically the COVID-19 pandemic. Most of those commenters shared the belief that the money and resources spent on the construction of border barriers should be reallocated to public health initiatives. A few commenters expressed concern about the potential spread of the virus in border communities due to the presence of construction crews.

3.13 Waiver of Environmental Laws

A total of 112 commenters expressed opposition over DHS' waiver of environmental laws to expedite construction. Comments mentioned specific laws that were waived, such as the National Environmental Policy Act.

3.14 Form Letters

A total of 6,282 form letters were received from one environmental organization which encouraged members and the general public to submit the letter in response to the request for public comments. These letters stated opposition to development of the infrastructure projects, citing concerns about wildlife, cost, public health, and efficacy of the barrier.

4. Review Next Steps

Stakeholder feedback, along with information from surveys of the project area, will inform project planning and execution. Stakeholder feedback will also inform the development of the ESP. The ESP will include a summary of the comments received and how they were addressed. The ESP will be released to the public through [CBP.gov](https://www.cbp.gov) upon completion.