BBT-5 - Big Bend Vehicle Border Barrier System

Comment Points

Overall approach

- Support effective border security while protecting the Big Bend's natural and cultural resources.
- Design security infrastructure to fit the landscape and actual operational need.
- Evaluate BBT-5 segment by segment, rather than applying a uniform solution across roughly 157 miles.

Site-specific need for vehicle barriers

- Identify the location of each proposed BBT-5 vehicle-barrier segment.
- Provide the operational justification for each segment.
- Explain what additional security benefit a constructed barrier provides where cliffs, canyons, steep slopes or other terrain already prevent or severely restrict vehicle crossings.
- Incorporate natural terrain into the security system wherever it can accomplish the same objective.
- **Where the terrain already provides an effective vehicle barrier, use it.**

Roads and construction access

- Identify any new or improved roads and temporary construction access required for BBT-5.
- Disclose their location, mileage, approximate width and disturbance footprint.
- Evaluate impacts from grading, cuts and fills, slope stabilization and drainage structures, particularly in rugged Terrell County/Lower Canyons terrain.
- Recognize that road construction may create substantially greater impacts than the vehicle barrier itself.
- Avoid constructing roads into presently inaccessible terrain simply to install barriers intended to keep vehicles out of that same terrain.

Less-damaging alternatives

- Evaluate cameras, remote sensors, infrared/thermal detection and other surveillance technologies as alternatives to physical barriers.
- Use technology and natural terrain where they can accomplish the security objective with substantially less disturbance.
- Do not assume that the same security solution is appropriate throughout BBT-5.
- Construct physical barriers only where CBP can demonstrate an operational need for them.

Rio Grande and Lower Canyons

- Give particular attention to BBT-5 activities in Terrell County and the Lower Canyons.
- Provide detailed mapping showing proposed barriers in relation to the Rio Grande, Wild and Scenic River corridor, major tributary drainages and other sensitive resources.
- Identify associated infrastructure that may affect these areas.
- Evaluate impacts to the entire project footprint - not simply the barrier itself.
- Protect the remote, undeveloped and scenic character of the Lower Canyons and Rio Grande corridor.

Public access to the Rio Grande

- Identify all existing public river access points, roads, trails, put-in and take-out locations, and other recreational access within or adjacent to the BBT-5 project area.
- Disclose whether construction or operation of the proposed barrier system would close, restrict, relocate, gate or otherwise affect lawful public access to the Rio Grande.
- Maintain existing lawful public access to the Rio Grande. Particular attention should be given to recreational boating and emergency access associated with the Lower Canyons.

Drainage, erosion and flooding

- Identify significant arroyos, washes and canyon drainages crossed or affected by BBT-5.
- Evaluate how barriers, roads, grading and drainage structures could alter natural flows.
- Analyze potential runoff concentration, erosion, sedimentation and accumulation of flood debris.

- Design infrastructure to accommodate natural drainage and flash-flood conditions rather than creating long-term erosion or maintenance problems.

Wildlife and cultural resources

- Evaluate wildlife movement at proposed barrier locations.
- Provide appropriately designed wildlife passages wherever compatible with the vehicle-control purpose.
- Survey the entire disturbance footprint for archaeological and cultural resources.
- Include roads, temporary access, utility corridors, surveillance sites, staging areas and other construction areas in those surveys.
- Make avoidance of significant archaeological and cultural resources the preferred approach wherever practicable.

Permanent infrastructure and reclamation

- Clearly distinguish permanent operational infrastructure from temporary construction infrastructure.
- Remove and reclaim temporary roads and construction areas when they are no longer needed.
- Restore natural contours where practicable.
- Treat compacted soils and address erosion.
- Revegetate disturbed areas with locally appropriate native species.
- If permanent lighting is contemplated, evaluate infrared, thermal and other non-visible alternatives to protect Big Bend's dark skies.

Meaningful public participation

- Identify which BBT-5 decisions remain open to modification despite contracting having already occurred.
- Explain how comments received during this comment period can affect final alignments, designs and construction plans.
- Incorporate public input while alternatives remain available and before irreversible ground disturbance occurs.

Overall KBBW recommendation

- Evaluate BBT-5 on a site-specific, segment-by-segment basis.
- Limit barriers, roads and other permanent infrastructure to locations where CBP can demonstrate an actual operational need.
- Prefer existing terrain and less-damaging technology where they can accomplish the same security objective.
- Exercise particular restraint in the Lower Canyons and other exceptionally wild and remote areas.
- **Border security infrastructure should fit the Big Bend landscape rather than requiring the Big Bend landscape to be altered to fit the infrastructure.**