Keep Big Bend Wild

Comments on BBT-5 - Big Bend Vehicle Border Barrier System Construction
Brewster, Terrell and Val Verde Counties, Texas

U.S. Customs and Border Protection

U.S. Border Patrol Headquarters

Program Management Office Directorate

Keep Big Bend Wild (KBBW) appreciates the opportunity to provide comments regarding the proposed Big Bend Vehicle Border Barrier System Construction associated with the BBT-5 project in Brewster, Terrell and Val Verde Counties, Texas.

As we have stated in previous comments concerning proposed border infrastructure in the Big Bend region, KBBW supports effective border security. We also believe that border security and protection of the extraordinary natural and cultural resources of the Big Bend need not be in conflict. The location and design of security infrastructure should reflect the landscape in which it will be constructed and the actual operational need at each location.

That principle is particularly important for BBT-5.

CBP has described this project as approximately 157 miles of non-contiguous vehicle barrier system extending through portions of Brewster, Terrell and Val Verde Counties. Much of this area, particularly in Terrell County and the Lower Canyons region of the Rio Grande, consists of exceptionally rugged and remote terrain. In many locations, cliffs, canyons, steep slopes and major drainages already severely restrict or prevent vehicle travel.

KBBW therefore asks CBP to evaluate the need for BBT-5 on a segment-by-segment basis rather than assuming that a constructed vehicle barrier is necessary throughout the project area.

Site-Specific Need for Vehicle Barriers

CBP should identify the location of each proposed vehicle-barrier segment and provide the operational justification for constructing a barrier at that location.

Where existing terrain already prevents or severely restricts vehicle crossings, CBP should explain what additional security benefit would result from construction of a physical vehicle barrier. Natural barriers should be incorporated into the border-security strategy wherever they can accomplish the same operational objective without unnecessary construction and disturbance.

Simply stated, where the terrain already provides an effective vehicle barrier, CBP should use it.

Roads and Construction Access

KBBW is particularly concerned about the roads and access that may be necessary to construct and maintain BBT-5.

The current proposal does not provide the public with sufficient information to understand the extent of new or improved roads that may accompany the proposed vehicle barriers. CBP should disclose the location, mileage, approximate width and disturbance footprint of any new or improved permanent roads and temporary construction access associated with BBT-5.

In the rugged terrain of Terrell County and the Lower Canyons, construction of roads capable of supporting heavy equipment could require significant grading, cuts and fills, drainage structures and slope stabilization. In some locations, those impacts could be substantially greater than the impact of the vehicle barrier itself.

CBP should avoid constructing roads into presently roadless or inaccessible terrain merely to install vehicle barriers intended to prevent vehicles from entering terrain they could not otherwise traverse.

Consider Less-Damaging Alternatives

BBT-5 should not employ a uniform solution across a highly varied landscape.

Where topography already prevents vehicle crossings, CBP should evaluate cameras, remote sensors, infrared or thermal detection and other surveillance technologies as alternatives to physical barriers and associated road construction.

The appropriate security solution may vary considerably from one location to another. Physical barriers should be constructed where an operational need can be demonstrated, while technology and natural terrain should be relied upon where they can accomplish the same objective with substantially less environmental disturbance.

Rio Grande and Lower Canyons

KBBW is especially concerned about proposed BBT-5 activities in Terrell County and along the Lower Canyons of the Rio Grande.

This is one of the most remote and undeveloped landscapes remaining along the United States-Mexico border. Portions of the Rio Grande in this area are federally designated as part of the Rio Grande Wild and Scenic River.

CBP should provide sufficiently detailed mapping to identify proposed BBT-5 vehicle barriers and associated infrastructure in relation to the Rio Grande, the Wild and Scenic River corridor, major tributary drainages and other sensitive resources.

Potential effects should be evaluated for the complete project footprint, including any roads, construction access, surveillance installations, utilities and other supporting infrastructure ultimately determined to be necessary.

Public Access to the Rio Grande

CBP should identify all existing public river access points, roads, trails, boat put-in and take-out locations, and other recreational access within or adjacent to the BBT-5 project area, and 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.

Existing lawful public access to the Rio Grande should be maintained.

Particular attention should be given to access used for recreational boating and river trips through the Lower Canyons, including established put-in, take-out and emergency access locations.

Drainage, Erosion and Flooding

The BBT-5 project area includes numerous arroyos, washes and canyon drainages subject to intense flash-flood events.

CBP should identify significant drainage crossings and evaluate the potential for roads, grading, barriers and drainage structures to alter natural flows, concentrate runoff, increase erosion or accumulate flood debris.

Infrastructure should be located and designed to work with natural drainage systems rather than creating long-term erosion, maintenance or downstream impacts.

Wildlife and Cultural Resources

Because the stated purpose of the proposed vehicle barriers is to prevent vehicle passage, their design should not unnecessarily impede wildlife movement.

CBP should evaluate wildlife movement at proposed barrier locations and incorporate appropriately designed wildlife passage wherever consistent with the vehicle-control objective.

Similarly, cultural-resource inventories should encompass the entire potential disturbance footprint rather than only the barrier alignment. Surveys should include roads, temporary access, utility corridors, surveillance locations, staging areas and other areas that may be affected by construction.

Avoidance of significant archaeological and cultural resources should be the preferred approach wherever practicable.

Minimize Permanent Infrastructure and Reclaim Temporary Disturbance

CBP should clearly distinguish infrastructure required permanently for border operations from roads and other disturbance needed only during construction.

Temporary construction roads, staging areas and other disturbed sites should be reclaimed when no longer required. Reclamation should include restoration of natural contours where practicable, treatment of compacted soils, erosion control and revegetation using locally appropriate native plant material.

If permanent lighting is contemplated anywhere within BBT-5, CBP should also evaluate alternatives using infrared, thermal or other non-visible technologies to protect the exceptional dark skies of the Big Bend region.

Meaningful Public Participation

Finally, KBBW asks CBP to clarify how the current public-comment process can influence BBT-5.

Major contracting for BBT-5 has already occurred while important details concerning the location and design of barriers and associated infrastructure remain under development. CBP should identify which project decisions remain open to modification and explain how information received during this comment period will be considered before final alignments and construction plans are approved.

Meaningful public participation is most valuable while alternatives remain available and before irreversible commitments are made on the ground.

Conclusion

Keep Big Bend Wild recognizes the responsibility of CBP to secure the nation's border. We believe that objective can be accomplished in the Big Bend while exercising restraint in one of America's most extraordinary and intact desert landscapes.

BBT-5 should be evaluated segment by segment. Physical vehicle barriers, new roads and other permanent infrastructure should be limited to locations where CBP can demonstrate a specific operational need. Where existing terrain or less damaging surveillance and detection technologies can accomplish the same security objective, those alternatives should be preferred.

Border security infrastructure should fit the Big Bend landscape rather than requiring the Big Bend landscape to be altered to fit the infrastructure.

We urge CBP to apply that principle throughout the final planning and design of BBT-5.

Respectfully submitted,

Keep Big Bend Wild