



Customs and Border Protection Remediation Plan for the Tucson Sector

Key Messages for Public Comment

How to comment:

Provide comments by February 3, 2022.

- Call 1-800-514-0638.
- Email TucsonComments@cbp.dhs.gov with the subject “Tucson Remediation Plan Comments.”
- Submit comments on specific proposed actions using [CBP’s online interactive map](#).
- Mail a physical copy to: U.S. Customs and Border Protection, U.S. Border Patron Headquarters, 1300 Pennsylvania Ave. 6.5E Mail Stop 1039, Washington D.C. 20229-1100.

Make your comments count:

- Understand the priority locations along the border where urgent environmental actions are needed. Use [this Google Map](#) that contains photos and key messages to guide your comments.
- Use your own words to differentiate your personal comments from those submitted by others.
- Include **KEY WORDS** that will help the comments get tallied accurately for the correct places and actions. Examples of key words to use are **highlighted** in the statements below.

UNDERSTAND THE REMEDIATION PLAN—WHAT ARE THE DEFICIENCIES?

This “plan” does not follow the [National Environmental Protection Act \(NEPA\)](#), which is an environmental review process triggered when any significant federal action is proposed. NEPA is not being followed because NEPA was waived at the border. Because of this and other waivers, the remediation plan does not include elements expected in an Environmental Assessment:

- The purpose and need for the proposed action,
- Alternatives (as required by section 102(2)(E) of NEPA),
- The environmental impacts of the proposed action and alternatives,
- A listing of agencies and persons consulted.

There is no specific language or location data for where “gaps” in the border wall are, and the plan does not include any identifying information that describes which gaps will be filled. *Department of Homeland Security staff verbally conveyed to the Border Coalition that gaps to be closed are 20-100 feet in length, so we believe that larger unwallied sections of border are not an immediate risk in this remediation plan.*

The most severe damage caused by blasting in places like Coronado National Memorial, Guadalupe Canyon, Organ Pipe Cactus National Monument, the Patagonia Mountains, Cabeza Prieta National Wildlife Refuge, and other places were not identified in the CBP document. No photos of this damage appear in the plan.

Major watercourses and tributaries, like the Santa Cruz and San Pedro Rivers, Silver Creek, Black Draw, and Hay Hollow, are under threat because the CBP plan does not mention maintaining open corridors for water and wildlife in any of these locations.

Since the gaps in the border wall are not identified in the remediation plan, there is no effective way for the public to comment on the process and file their objections or support.

Stadium lighting, which has been installed in numerous segments such as the San Bernardino Valley, are not an item that has been addressed in the plan. These lights should never be turned on.

KEY MESSAGES FOR COMMENT LETTERS

Do not close gaps in the wall. The priority must be protecting remaining wildlife corridors from further fragmentation and beginning to remove physical barriers to restore natural wildlife migration, habitat, and flow of water. The top priority wall gaps to leave open are over the Santa Cruz River and in jaguar Designated Critical Habitat (Baboquivari and Atascosa).

Keep gates across rivers open year-round on the San Pedro River, Silver Creek, Black Draw, and Hay Hollow to reopen vital wildlife corridors during dry seasons when wildlife must be able to move in search of water on the landscape.

Create large wildlife openings in the wall to protect the short-term survival and long-term persistence of wildlife populations on both sides of the border. These openings should be significantly larger than the 8.5 x 11" small wildlife opening proposed to allow the seasonal migration and daily movement of multiple species across the border. We strongly encourage CBP to follow the recommended underpass dimensions in the Wildlife Crossing Structure Handbook from the U.S. Department of Transportation and Federal Highways Administration and create wall openings with a minimum dimension of 23 feet wide and 13 feet high and preferred dimension of >32 feet wide and >13 feet high. These large openings should occur every mile along the wall and be monitored for effectiveness using camera traps.

Decommission patrol road extensions. New border roads into previously inaccessible high-elevation areas pose security and severe erosion risks to Sky Island habitats. The patrol road extensions in Coronado National Forest, Coronado National Monument, and Guadalupe Canyon should be decommissioned and the habitat restored under the direction of public land managers.

Disturbed habitat needs erosion control, revegetation, and invasive species monitoring. In consultation with local public land managers, all disturbed land including rockfall, erosion, staging, and disturbed areas should be first evaluated for potential erosion risk and stabilized, then revegetated with native plants and seed. These areas are highly prone to invasion by noxious weeds, and an invasive species monitoring and response program should be carried out as the remediation.

Turn off all lighting infrastructure, including arrays integrated into the wall and free-standing lighting installations near the wall, because it interferes with the natural behavior of wildlife including bird migration and pollutes dark skies with artificial light.

ADDITIONAL RECOMMENDATIONS ON BEST PRACTICES

Follow all environmental laws including the National Environmental Protection Act (NEPA).

Solicit, accept, and **implement remediation recommendations made by other federal agencies** under the Department of Interior including U.S. Fish and Wildlife Service, National Park Service, and Bureau of Land Management and the Department of Agriculture including U.S. Forest Service.

Prevent the spread of invasive species in all construction areas by cleaning equipment and establishing an invasive species monitoring and eradication program for target species identified by the [Arizona Department of Agriculture Noxious Weed list](#) and [USDA Invasive Plants and Weeks of the National Forests and Grasslands in the Southwest Region](#).

Avoid construction in the spring and summer to minimize impacts to wildlife during seasonal migration and reproduction.

ADDITIONAL LOCATION INFORMATION

(Latitude/Longitude available in table below)

- A. Do not close gaps in the wall**—The most important wall gaps to keep open are:
1. Do not build a pedestrian barrier across the Santa Cruz River.
 2. Gap west of Sasabe in the Baboquivari Jaguar Critical Habitat Unit.
 3. Three gaps west of Nogales and east of Sasabe in the Atascosa Jaguar Critical Habitat Unit in the Coronado National Forest.
 4. Gaps in drainages that are crucial for wildlife migration at Buenos Aires NWR.
- B. Keep gates across rivers open year-round**—Provide an unobstructed large mammal passage across the border at major rivers and water courses:
1. Keep flood gates open at the San Pedro River year-round. (San Pedro National Conservation Area)
 2. Keep flood gates open at the Silver Creek year-round (State of Arizona/Bureau of Land Management).
 3. Keep flood gates open at Black Draw year-round (San Bernardino National Wildlife Refuge).
 4. Keep flood gates open at Hay Hallow year-round (San Bernardino National Wildlife Refuge).
- C. Create large wildlife openings** in these priority locations:
1. Cabeza Prieta National Wildlife Refuge in the Sonoran Pronghorn Corridor where the survival of endangered pronghorn depends on access to habitat on both sides of the border.

2. Organ Pipe Cactus National Monument where Quitobaquito Springs provides an oasis for numerous wildlife species.

D. Priority patrol road decommissioning:

1. Decommission patrol road extension on Coronado National Forest west of the Patagonia Mountains. Terminate border road at end of wall/FS Road 4903.
2. Terminate the border road on Coronado National Forest at Yaqui Spring FS Road west of Huachuca Mountain switchbacks and decommission patrol road extension.
3. Terminate the border road on Coronado National Memorial east of the switchbacks and decommission the patrol road extension.
4. Terminate the patrol road that enters Guadalupe Canyon in the Peloncillo Mountains and continues to the New Mexico state line. This is the Peloncillo Unit of critical habitat for the endangered jaguar and vehicle traffic should be kept to a minimum.

Comment Locations:

Location	Latitude, Longitude
A1 Santa Cruz River – Do not close wall gap	31.33403, -110.85073
A2 Baboquavari – Do not close wall gap	31.497, -111.588
A3 Atascosa – Do not close three wall gaps	31.39806, -111.2786 31.39383, -111.26546 31.38907, -111.25065
A4 Buenos Aires NWR – Do not close two wall gaps	31.4718, -111.50956 31.46977, -111.50311
B1 San Pedro River – Keep flood gates open	31.3344, -110.14808
B2 Silver Creek – Keep flood gates open	31.33419, -109.30044
B3 Black Draw – Keep flood gates open	31.3341, -109.26006
B4 Hay Hollow – Keep flood gates open	31.33406, -109.2528
C1 Cabeza Prieta NWR – Create large wildlife opening	32.19892, -113.8453
C2 Organ Pipe Cactus NM – Create large wildlife opening	31.94261, -113.02118
D1 Coronado National Forest/Patagonia Mts – Decommission road	31.33369, -110.79231
D2 Coronado National Forest/Huachuca Mts – Decommission road	31.33381, -110.2922
D3 Coronado National Monument – Decommission road	31.33388, -110.27232
D4 Guadalupe Canyon – Decommission road	31.33377, -109.07102