

Southwest Section
of
The Wildlife Society

P.O. Box 714
Aztec, NM 87410

May 12, 2018

The Honorable Kay Granger
1026 Longworth House Office Building
Washington, DC 20515

Dear Representative Granger:

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals and wildlife students to conserve biodiversity, sustain productivity, and ensure responsible use of wildlife resources and habitats. Collectively, the Western and the Southwest Sections of The Wildlife Society comprise 11 local Chapters, representing 2,000 professional wildlife managers, biologists, ecologists, botanists, and students from Arizona, California, Hawaii, Nevada, New Mexico, Texas, and Guam – all devoted to the sustainable conservation of wildlife and wildlife habitat in the western United States.

We are writing to provide our expert opinion about the ecological impacts of the Administration's proposed Border Wall.

We recognize that the United States has the right and responsibility to secure its borders against entry by terrorists, smugglers, and others engaged in illegal activities, but some border security measures can have a deleterious impact on wildlife. Section 102(c) of the Real ID Act of 2005 allows the Secretary of Homeland Security to treat construction of roads and barriers along U.S. borders as exempt from all federal, state, and local environmental laws, including the Endangered Species Act and the National Environmental Policy Act. Waiving environmental analysis for border security measures means there is no opportunity to assess impacts to wildlife and habitats, or to design or adopt reasonable mitigations that could avoid or reduce impacts while still achieving border security objectives.

As scientists who specialize in studying wildlife population dynamics and animal behavior, we know that impermeable barriers placed in sensitive habitats can limit and disrupt the established demographic and genetic interchange among wildlife populations, disrupt normal seasonal movements of wildlife populations, and reduce the ability of species to shift ranges in response to local weather conditions and, ultimately, to climate change.

The U.S.-Mexico border region hosts a fragile desert ecosystem. It supports diverse populations of terrestrial birds and mammals that depend on the ability to move north and south across the border to survive. They include charismatic species such as cougars, desert bighorn sheep, the endangered North American jaguar, and the ocelot.

In our opinion, Congress correctly prohibited funding for border wall construction in the Santa Ana National Wildlife Refuge in the FY2018 Budget. However, we encourage you to consider that this region contains at least eleven U.S. and three Mexican designated conservation areas, including wildlife refuges, national parks, Globally Important Bird Areas, and biosphere reserves. While the Santa Ana Wildlife Refuge has been called “the crown jewel” of the National Wildlife Refuge System, other areas along our border are equally important. Therefore, we recommend that the environmental impacts of any border wall or fence be viewed with respect to the entire region – not just individual protected areas.

The proposed Border Wall would bisect the ecosystems and habitats in Big Bend National Park, San Pedro Riparian National Conservation Area, and Coronado National Memorial, among others. Collaborative conservation efforts that have taken decades and millions of dollars to implement on the Lower Rio Grande Valley National Wildlife Refuge would be adversely affected.

According to the U.S. Fish and Wildlife Service, nature tourism brings approximately \$300 million per year into the local economy of the Rio Grande Valley. This border area is the target destination for many nature tourists who support local businesses. National Park Service visitor statistics indicate that in 2017, the National Parks along the border with Mexico attracted over 2 million visitors from around the world.

With the above concerns in mind, the Western and Southwest Sections of The Wildlife Society request that border security be implemented with consideration for the impacts to important wildlife species and their habitats. Crucial wildlife habitats and migration corridors should be avoided to the greatest extent feasible to enable protecting, studying, and researching the unique ecosystems; rare, threatened, and endangered species; and ecological processes in the border region. Consistent with The Wildlife Society’s position statement on “The Impact of Border Security Measures on Wildlife,” we reiterate the following policy recommendations:

1. Recommend that Congress repeal section 102(c) of the Real ID Act of 2005, so that the construction of roads and barriers along US borders are no longer exempt from all federal, state, and local environmental laws.
2. Support new legislation to require the Department of Homeland Security to (a) determine the effects that border security structures and operations will have on wildlife and explore alternatives to impermeable fences, and (b) require compliance with environmental laws.
3. Request that the Secretary of Interior (through the Director of the US Fish and Wildlife Service) and the Secretary of Homeland Security identify and implement measures that will mitigate negative impacts of existing and potential border security structures to wildlife.
4. Request that the Secretary of Homeland Security issue a moratorium on further construction of fences along the U.S.-Mexico border to allow the Secretary and the Director of the U.S. Fish and Wildlife Service to investigate and consider reasonable alternatives to an impenetrable barrier. Study and mitigation are needed not only for physical barriers but also for patrol activities, manipulation of vegetation, and the virtual fence under construction along some portions of the U.S.-Mexico border.
5. Support research on alternatives to impermeable fences, such as combinations of vehicle barriers, electronic surveillance (including a variety of electronic sensors and aerial or land

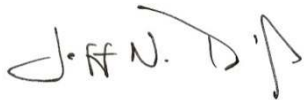
monitoring devices), and various designs of crossing structures that allow permeability through a constructed barrier. Successful alternatives should be used as models in other areas as appropriate.

6. Support research on the impacts to wildlife stemming from other border security measures, including stadium lighting, wide swaths cleared of vegetation, and patrol by vehicles and low-flying aircraft.
7. Support adequate funding for and implementation of projects to reduce damage to borderland wildlife and habitat.

We urge you to consider the above concerns regarding funding of the proposed Border Wall during your review of the President's FY2019 Budget.

If you would like any assistance from the Conservation Affairs Committees of the Western and/or Southwestern Sections of The Wildlife Society, please contact Kelly Holland, Western Section TWS Conservation Affairs Committee Chair, at conservation@twc-west.org or James Ramakka, Southwest Section TWS Conservation Affairs Committee Chair at j_ramakka@msn.com,

Sincerely,



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