



ARIZONA WILDLIFE FEDERATION

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RE: BORDER PROPOSALS

Sir:

The Arizona Wildlife Federation is taking this opportunity to comment on proposed activities outlined in the Programmatic EIS for QBP Operational Activities within the border areas of the Tucson and Yuma Sectors. While recognizing the evolving need for management of our country's borderlands through a variety of means, the Arizona Wildlife Federation believes these proposed activities would have environmental consequences that would be both severe and irreversible to the unique and fragile borderlands of Arizona.

1. The EIS gives no meaningful analysis of the affects of unlimited cross-country motorized access, increased infrastructure, road building, and other off-road operations on federally protected lands i.e. Wilderness Area, National Park Service, National Conservation Area, and National Wildlife Refuge.
2. The National Environmental Policy Act requires these proposals be subject to separate environmental analysis and there is no mention of this being done or any intention to do it.
3. The Border Patrol freely admits there will be adverse impacts to wildlife movement and dispersal corridors in an area that is home to endangered species that are dependent on habitat and wildlife corridors, yet has not completed required consultation with US Fish and Wildlife Service to analyze such impacts.
4. The EIS is inadequate due to inconsistencies, omissions and inaccuracies within the document thereby precluding the Public from having access to information that can be assimilated and understood.
5. The Wilderness Act of 1964 and other environmental laws will clearly be violated if these proposals are enacted, thereby setting the stage for future violations within designated Wilderness, and other federally protected lands across the country.
6. Historically the consequences of such proposals have been less than satisfactory, merely resulting in shifts of migrant traffic to adjacent lands. These occurrences are recorded in the document and are a foreseeable consequence of these proposed

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- actions. Since this is of significant, known impact, the agency is required to analyze the impacts stemming from these migrant traffic shifts in the EIS, but has not done so.
7. Current border policy deliberately funnels migrants away from inhabited areas and into remote and fragile areas of the desert southwest. This policy has led to major buildups of Border Patrol agents and infrastructure in these borderlands with the result of pushing migrant traffic and associated environmental impacts even further out into increasingly remote areas. The Border Patrol's own statistics confirm such policies have not changed the number of illegal entrants coming into this country over the ten years these strategies have been in use. The continued and increased emphasis on policies which have proven to be ineffective over a considerable time period seems to be at odds with the stated purpose of and need for the proposals outlined in this EIS.

The Arizona Wildlife Federation is Arizona's oldest conservation organization and is an affiliate of the world's largest conservation organization-the National Wildlife Federation. As such, we carry the responsibility of speaking for Arizona's habitat and wildlife, and for proper management of public lands in Arizona. Environmental consequences resulting from policies enacted on our borderlands are undeniable, ongoing, and cumulative. The fact that they are also ineffective causes the AWF to propose that the stated purpose of and need for actions outlined in the EIS be re-examined by the agency as to their true value before taxpayer dollars are invested.

We would further ask for clarification and factual answers to the points of question in this letter.

Sincerely,



Mary Jo Forman Miller
President