



August 13, 2012

Mr. Christopher J. Colacicco
Facilities Management and Engineering
1301 Constitution Ave., NW
Suite B-155
Washington, DC 20229

Dear Mr. Colacicco:

U.S. Customs and Border Protection (CBP) proposed to replace existing landing mat fence with bollard-style fencing, construct a 20-foot-wide construction road paralleling the new fence, and install a 20-foot-wide swing gate at the railroad crossing at the DeConcini Port of Entry (POE) for the U.S. Border Patrol (USBP) Nogales Station. All proposed construction was planned to occur within the Roosevelt Reservation within and near the city of Nogales, Arizona (Figure 1).

The purpose of this letter report is to summarize the fence replacement, road construction, and gate installation, and assess the final design and footprint of the new tactical infrastructure (TI). This letter will serve as the Environmental Stewardship Summary Report (ESSR) to compare the final completed action to the originally planned installation of TI, as proposed in the November 2011 *Final Environmental Stewardship Plan for the Proposed Nogales Fence Replacement Project, U.S. Border Patrol Tucson Sector, Nogales Station, Arizona*. The TI proposed in the Environmental Stewardship Plan (ESP) was constructed between March 25, 2011, and July 29, 2011.

CBP provided archaeological monitors during construction activities, who documented adherence to best management practices (BMPs) and observed for impacts on cultural resources within the project area. Monitors noted any deviations from the BMPs, such as trash in the project footprint and erosion on hillsides, as well as required corrections. At the close of construction activities, all infractions had been fully resolved. No impacts on cultural resources due to the construction and improvement activities were noted.

After the completion of the ESP, changes were made to the alignment, design, or methods to facilitate construction, reduce costs or potential impacts, respond to stakeholder requests, or enhance the efficacy of the fence for enforcement. These changes were reviewed and approved through CBP Headquarters and documented. This report also summarizes any significant modifications during construction that increased or reduced environmental impacts.

This ESSR was prepared to document the impact areas, compared with the original ESP and the changes identified for the project, for the following reasons:

1. To compare anticipated to actual impacts, so that a final new baseline is established for future maintenance and repair and any potential future actions.
2. To document success of BMPs and any changes or improvements for the future.
3. To document any changes to the planned location or type of the TI.

CBP consultants surveyed the project area and prepared “as-built” drawings of the final project corridor and infrastructure footprints. The as-built drawings identify differences between the planned and completed actions. Corridor maps are provided as an attachment to show the location of the legacy fence that was removed and replaced with new fence along the border, areas of improvements to existing roads, new road construction, low-water crossings and riprap installations, and the location of the new swing gate at the DeConcini POE (Figures 2 through 13). Table 1 summarizes the impacts of the project by comparing the estimated impacts for each type of tactical infrastructure deployed as described in the ESP and the actual impact as identified during post-construction surveys.

Table 1. Summary of Area Affected by the Project

Office of Border Patrol action	ESP estimated impact (acres)	Post-construction survey (acres)	Difference (acres)
New Road Construction	6.82	0.22	-6.6
Legacy Fence Replacement	2	1.4	-0.6
Low-water crossings	No acreage estimate	(concrete) 1.01 (riprap) 0.37	1.38
Concrete-lined Drainage near Maricopa POE	No acreage estimate	1.15	1.15
Gate at DeConcini POE	1 gate	1 gate	0
Existing Road Improvements	No acreage estimate	(concrete) 0.34 (gravel) 1.02	1.36
Impacts Outside of the Roosevelt Reservation	0	0.13	0.13
Total Impacts	8.82	5.64	-3.18

A low-water crossing and drainage gate system were installed immediately west of the Maricopa POE; these improvements accounted for the greatest increase in impacts not evaluated in the ESP. An area immediately north of the new border road, west of the low-water crossing near the Maricopa POE was also lined with concrete (Photograph 1). The concrete-lined drain impacted a total of 1.15 acres. In addition, road improvements to the existing border road were conducted including grading, filling to reduce incline grade, and laying



Photograph 1. Overview of the concrete-lined drain, west of Maricopa POE.

concrete in sections where erosion made the road impassable. The improvements to the existing border road impacted 1.36 acres.

Impacts also occurred beyond the Roosevelt Reservation, which were not assessed in the ESP. Approximately 0.13 acre was impacted by concrete road improvements on the existing border road north of the Roosevelt Reservation, west of the Maricopa POE.

The ESP anticipated the use of two previously disturbed staging areas: one near the west side of the Mariposa POE (see Figure 3) and one east of the project corridor along the easternmost access road (see Figure 13). Two additional previously disturbed staging areas were utilized during the construction phase. The first additional staging area used was immediately east of the Mariposa POE (Photograph 2 and Figure 4). The area was previously disturbed and devoid of vegetation. The second additional staging area was an industrial leased space north of the Mariposa POE on Arizona Highway 189, which was used to store construction equipment and as a fabrication yard for fence panels (Photograph 3).



Photograph 2. Overview of staging area east of Mariposa POE.



Photograph 3. Overview of leased staging area north of Mariposa POE.

The ESP anticipated that the planned action would permanently impact 8.82 acres of previously disturbed soils in the project corridor. The post-construction surveys indicated that road construction and improvements included cut-and-fill techniques to reduce the steep grades along much of the new and existing border road. All cut-and-fill activities were limited to the Roosevelt Reservation.

A small border marker (International Boundary and Water Commission [IBWC] 123) was found damaged when a portion of the legacy fence was removed west of the Mariposa POE (Photograph 4). Due to the location of the legacy fence, the small border marker had been approximately 50 feet south of the landing mat fence and was not accessible from the United States' side of the legacy landing mat fence; therefore, the



Photograph 4. Broken Border Marker IBWC 123, west of Mariposa POE.

construction activities associated with this project did not damage the marker. Gates were installed along the project corridor adjacent to border monuments, which are approximately 4 feet south of the fence. This will provide the U.S. Section, IBWC with access and space to repair and maintain the monuments. No new cultural resources were discovered in the project corridor.

The ESP reported that 0.73 acre of floodplains and 0.049 acre of waters of the United States would be impacted by construction within the project corridor. Results of the post-construction survey confirmed that the TI construction did not increase the footprint within the waters of the United States; however, additional impacts from the concrete-lined drain west of the Maricopa POE (see Photograph 1) occurred within the 100-year floodplain, impacting approximately 1.15 acres. No other additional wetlands or waters of the United States were identified.

Four clandestine tunnels were identified while excavating the footer for the new bollard fence. As the tunnels were discovered, agents from the USBP Nogales Station were notified (Photograph 5). The agents secured the tunnel and noted its location. The construction crew sealed the tunnels with concrete once the USBP finished their investigation.



Photograph 5. USBP agents inspecting a clandestine tunnel near West International Street, west of the DeConcini POE.

The ESP estimated that a new construction road would be built along the entire length of the project, 2.8 miles. Post-construction surveys showed that much of the existing roads that parallel the border were improved with surface improvements (i.e., gravel or concrete overlays) instead of establishing a new roadbed. Approximately 1.1 miles (2.2 acres) of new road was constructed.

Overall, increases in the project footprint were due to two additional staging areas and one portion of concrete road improvement. All areas used for staging were previously disturbed and devoid of vegetation. Approximately 0.13 acre was impacted by concrete road improvements on the existing border road north of the Roosevelt Reservation, west of the Maricopa POE. Still the net result was a reduction of 3.18 acres of permanent impacts compared to the impacts identified in the ESP.

The post-construction survey identified one additional issue that requires consideration. Large areas of exposed soil and erosion problems were noted along the border road and access roads. Although erosion control techniques were part of the design of the project (i.e., concrete road

improvements on hillsides, riprap, and hydromulch [Photograph 6]), due to the rough terrain, the entire project corridor will require monitoring and maintenance, especially following rain events.

In conclusion, this letter report serves as the ESSR for the Nogales Fence Replacement Project. All findings reported herein are based on the project's November 2011 Final ESP, the August 2011 as-built drawings certified by Michael Baker, Jr. Inc, and by personal observations of Gulf South Research Corporation's biologists and archaeologists as reported in weekly reports during construction monitoring. If you have any questions or comments regarding the findings of this report, please do not hesitate to contact me by phone (225-757-8088) or email (maria@gsrcorp.com).

Sincerely,



Maria Bernard Reid
Natural Resources
Gulf South Research Corporation

enclosure: Figures 1 through 13



Photograph 6. Green hydromulch on hillside between elevated legacy road and new construction road, west of the DeConcini POE.

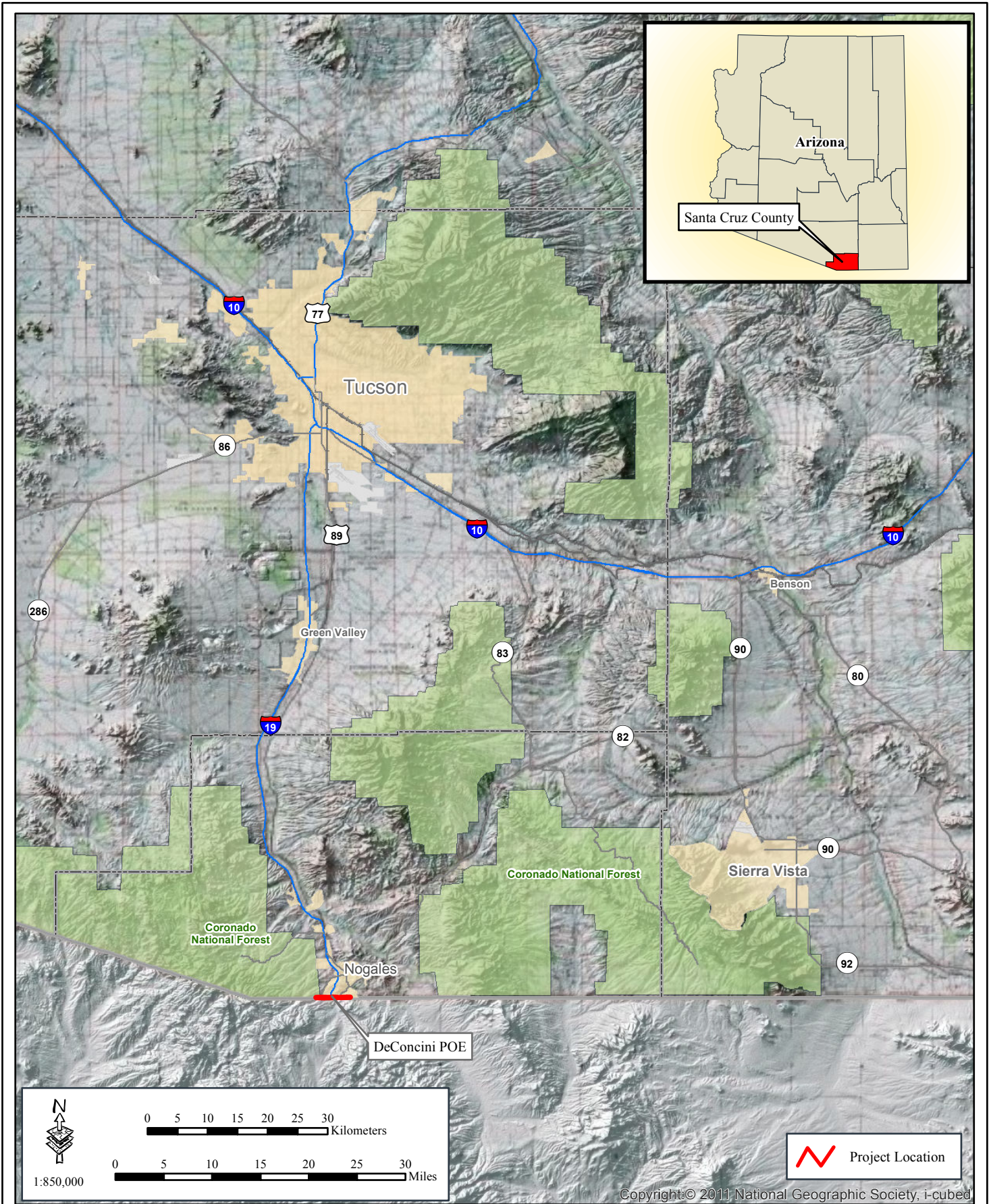


Figure 1. Vicinity Map

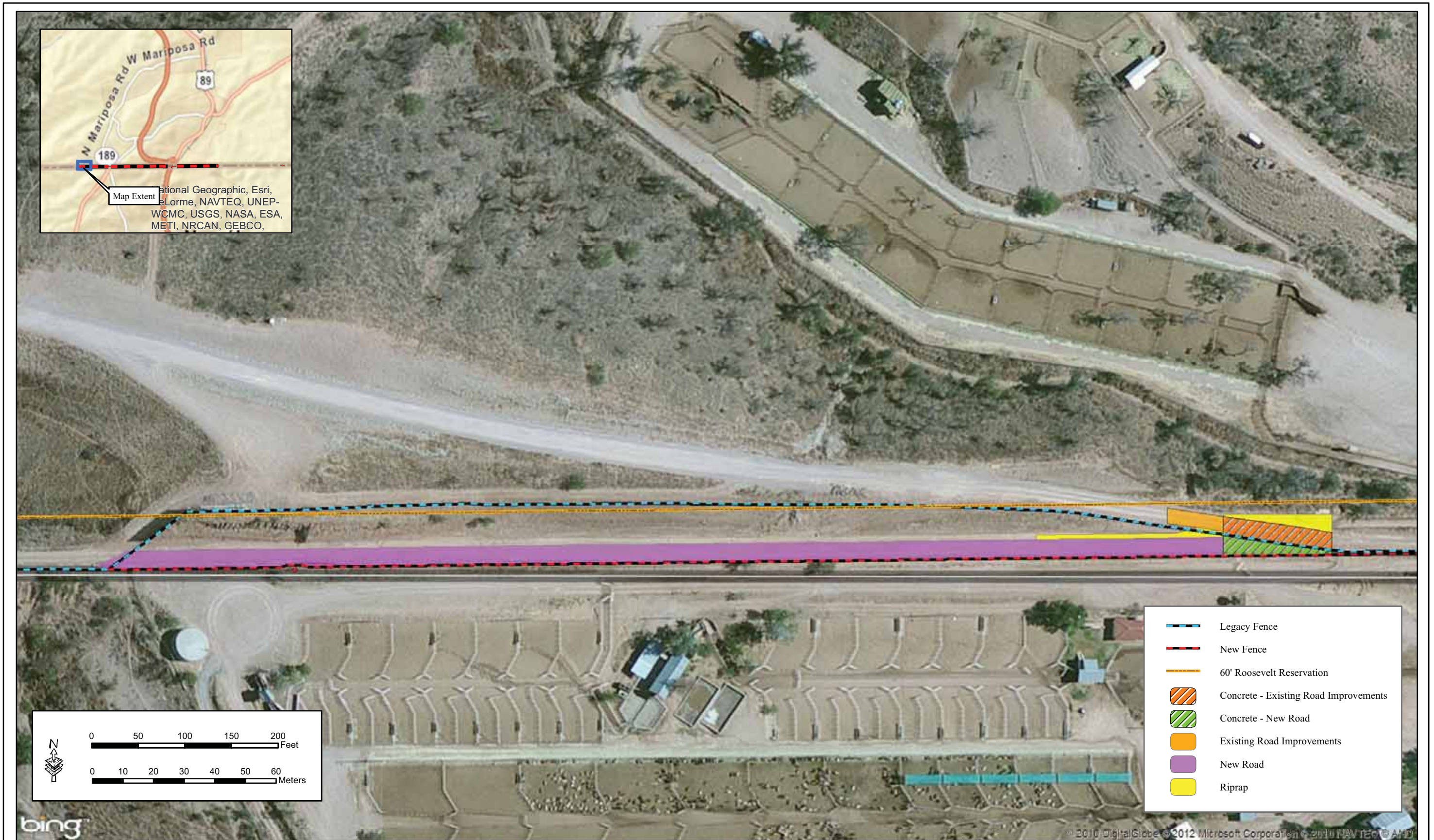


Figure 2. Corridor Map 1

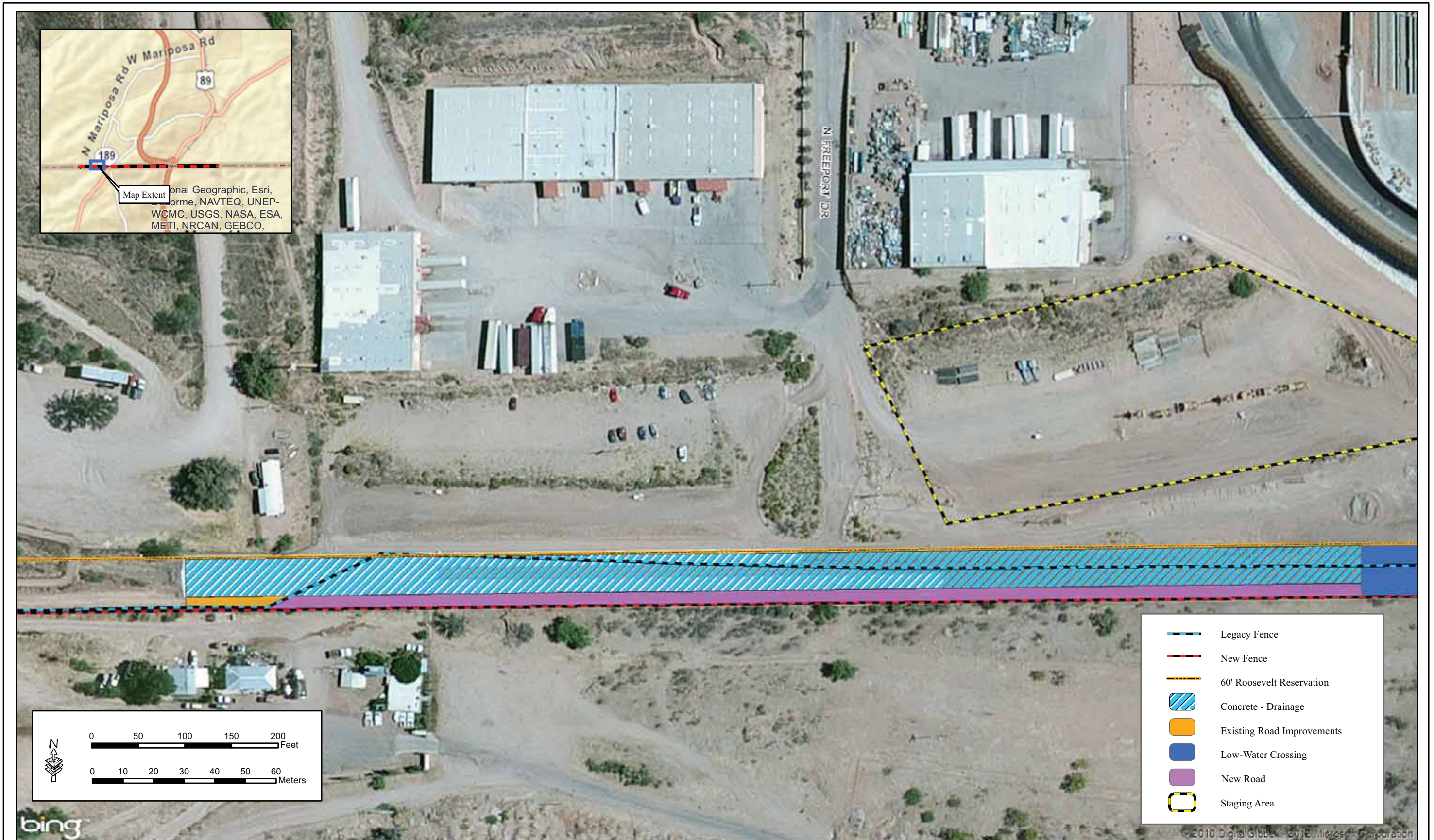


Figure 3. Corridor Map 2

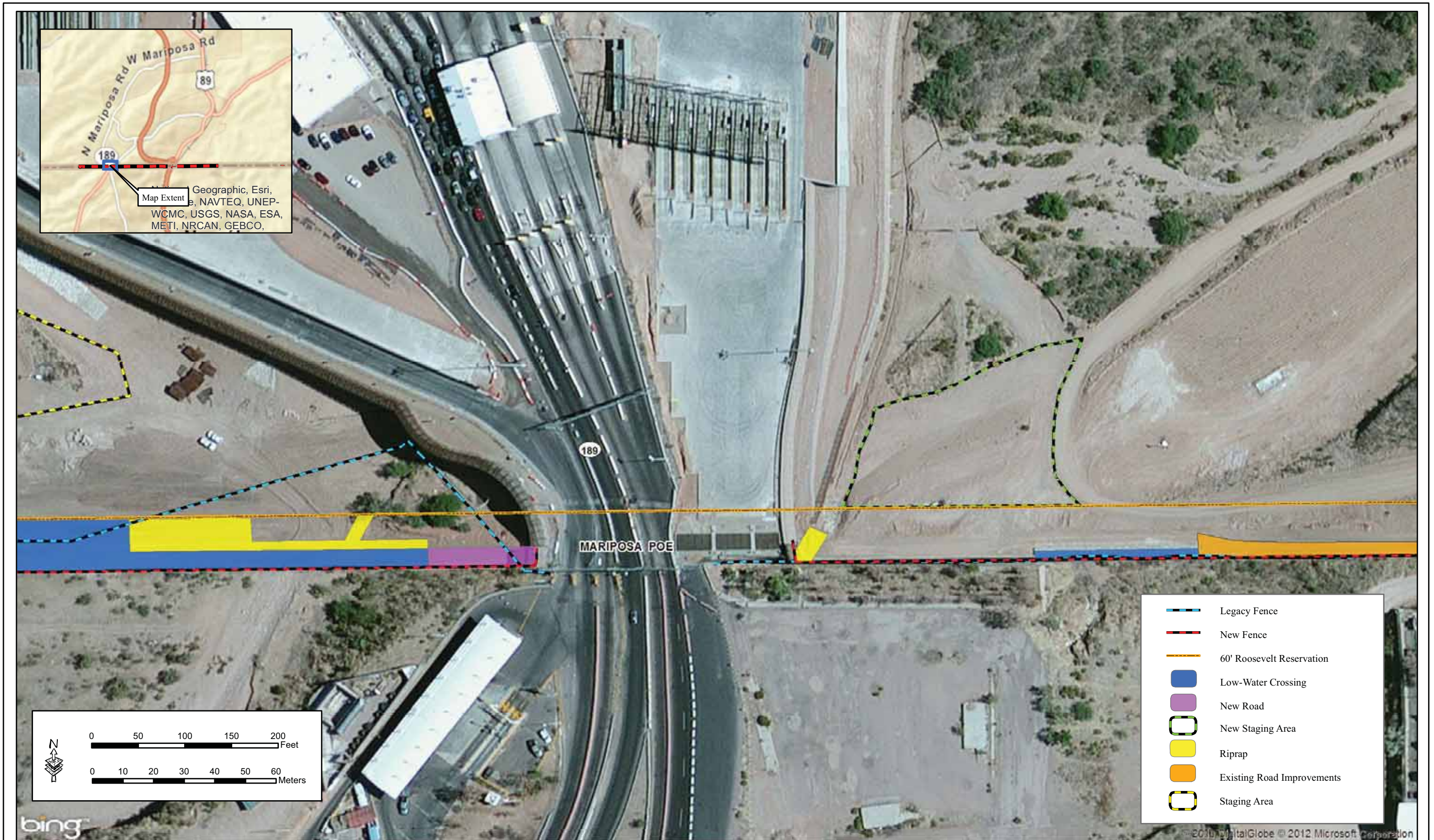


Figure 4. Corridor Map 3



Figure 5. Corridor Map 4

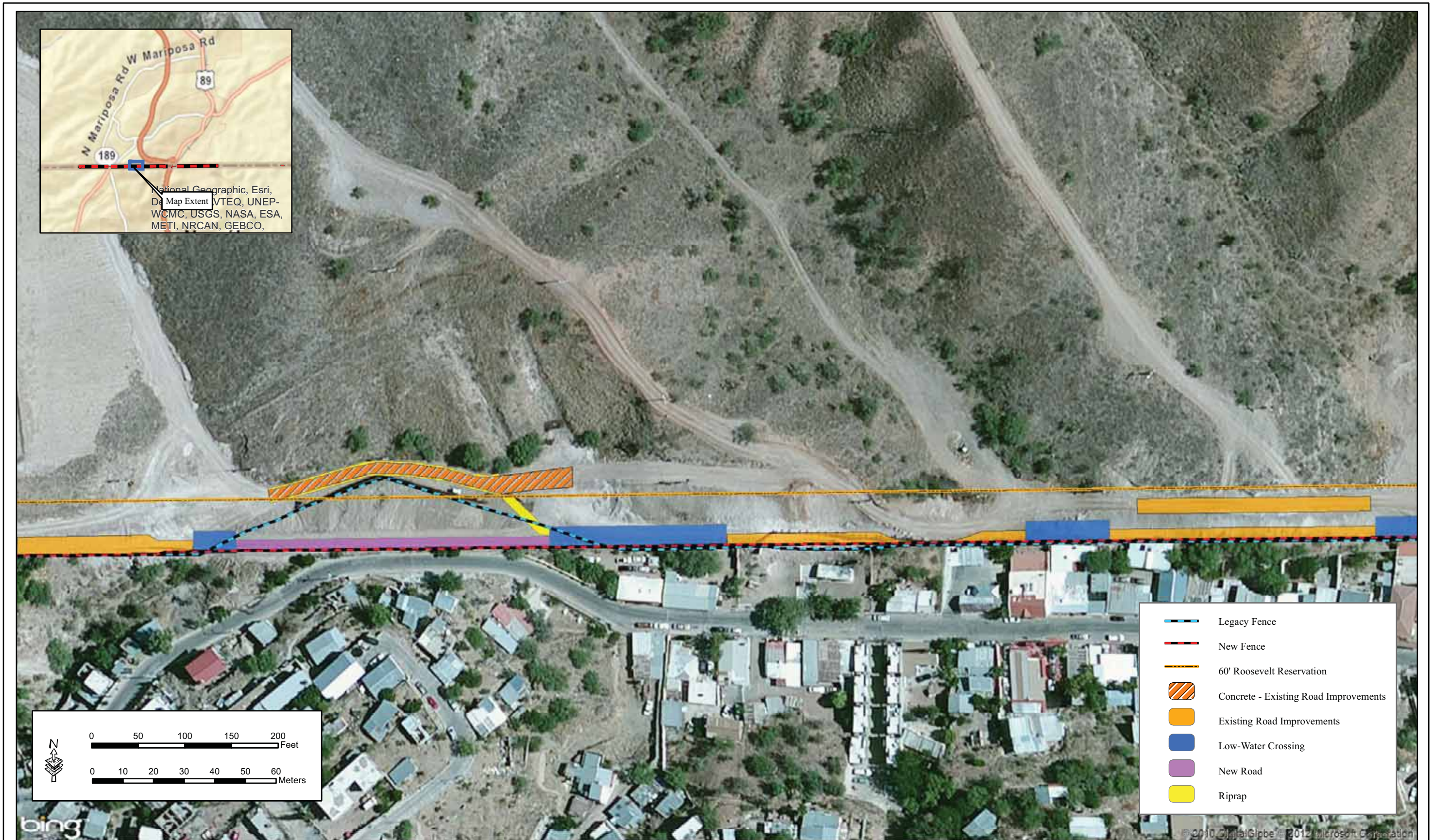


Figure 6. Corridor Map 5

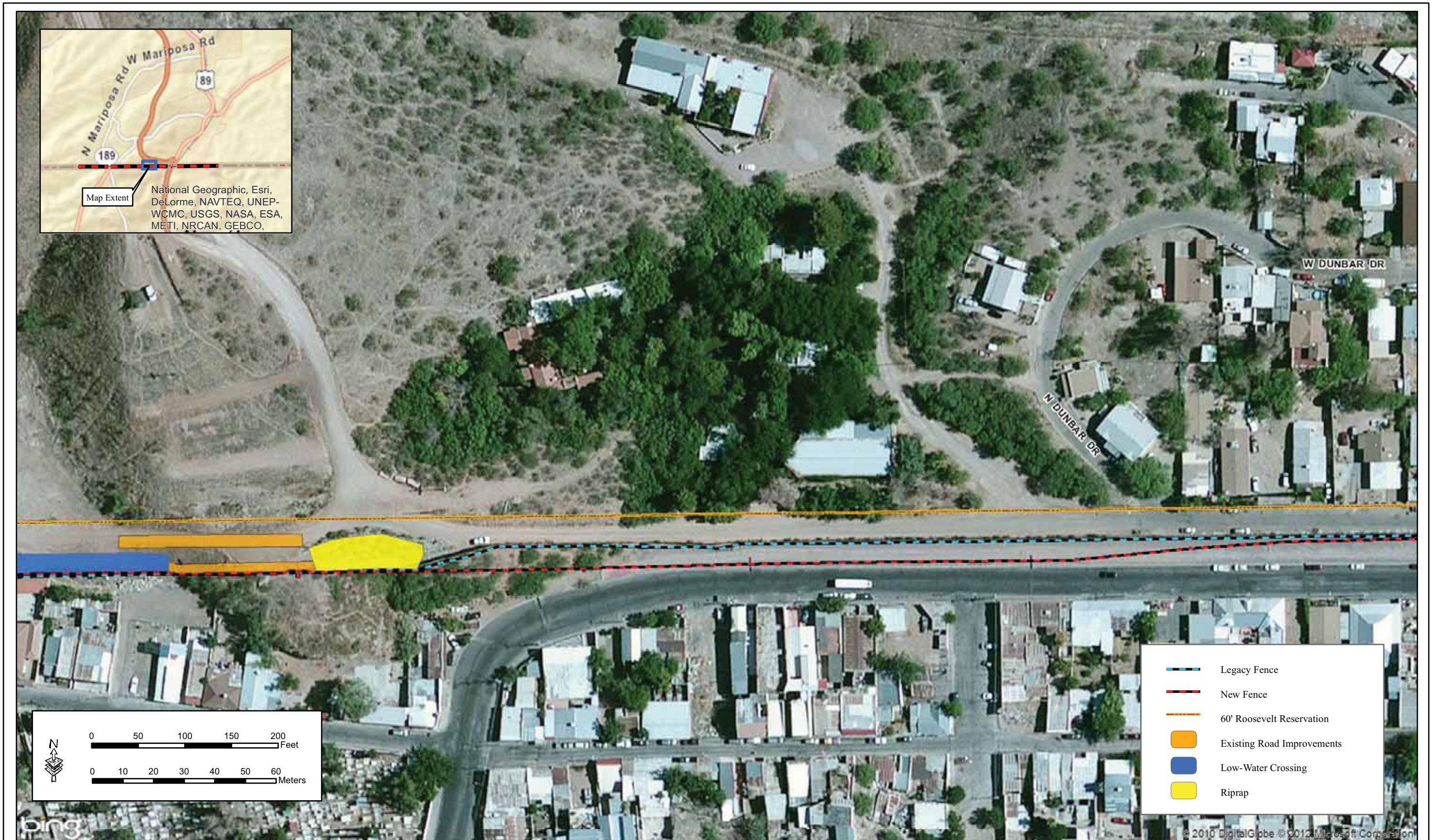


Figure 7. Corridor Map 6



Figure 8. Corridor Map 7

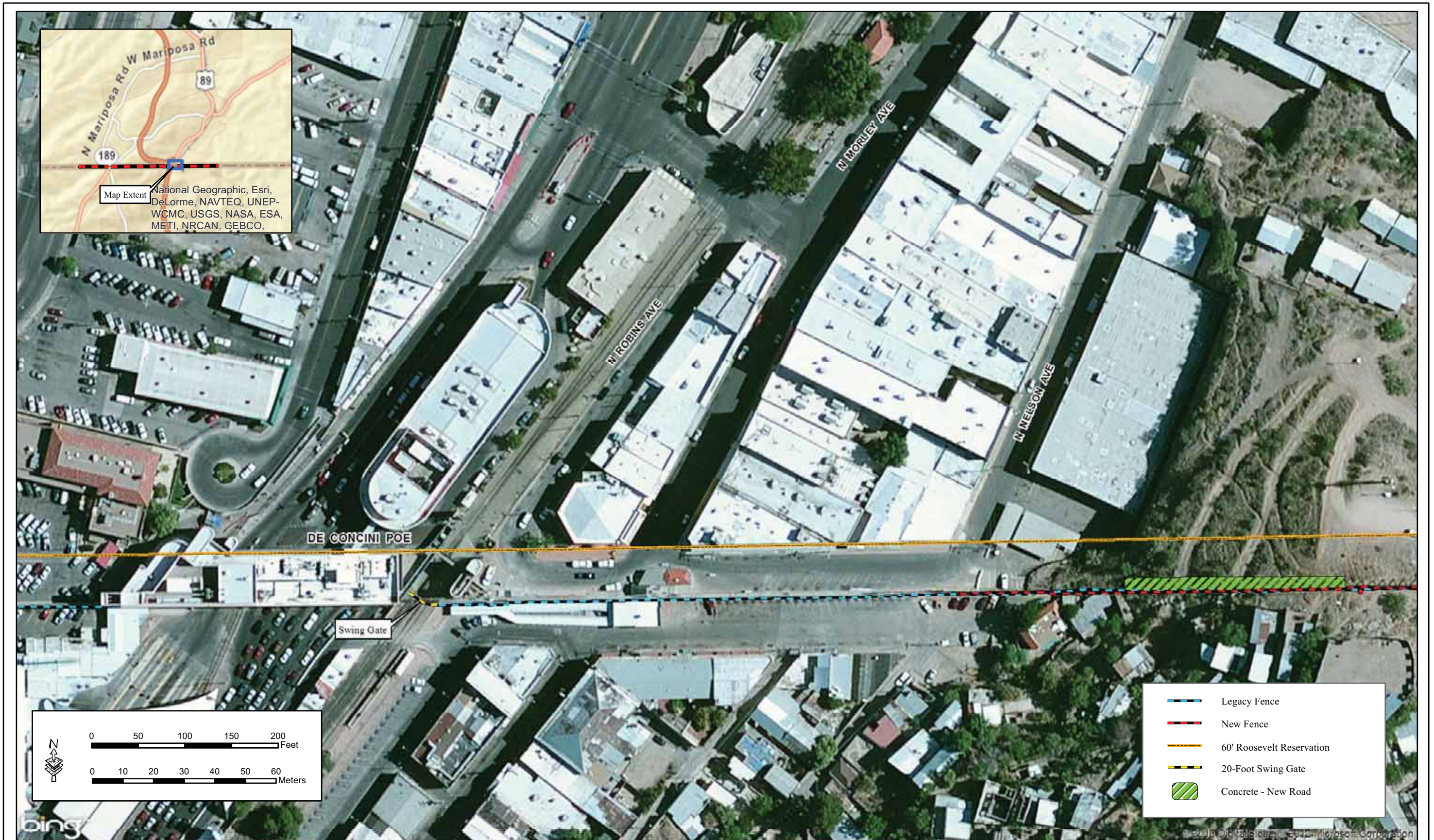


Figure 9. Corridor Map 8

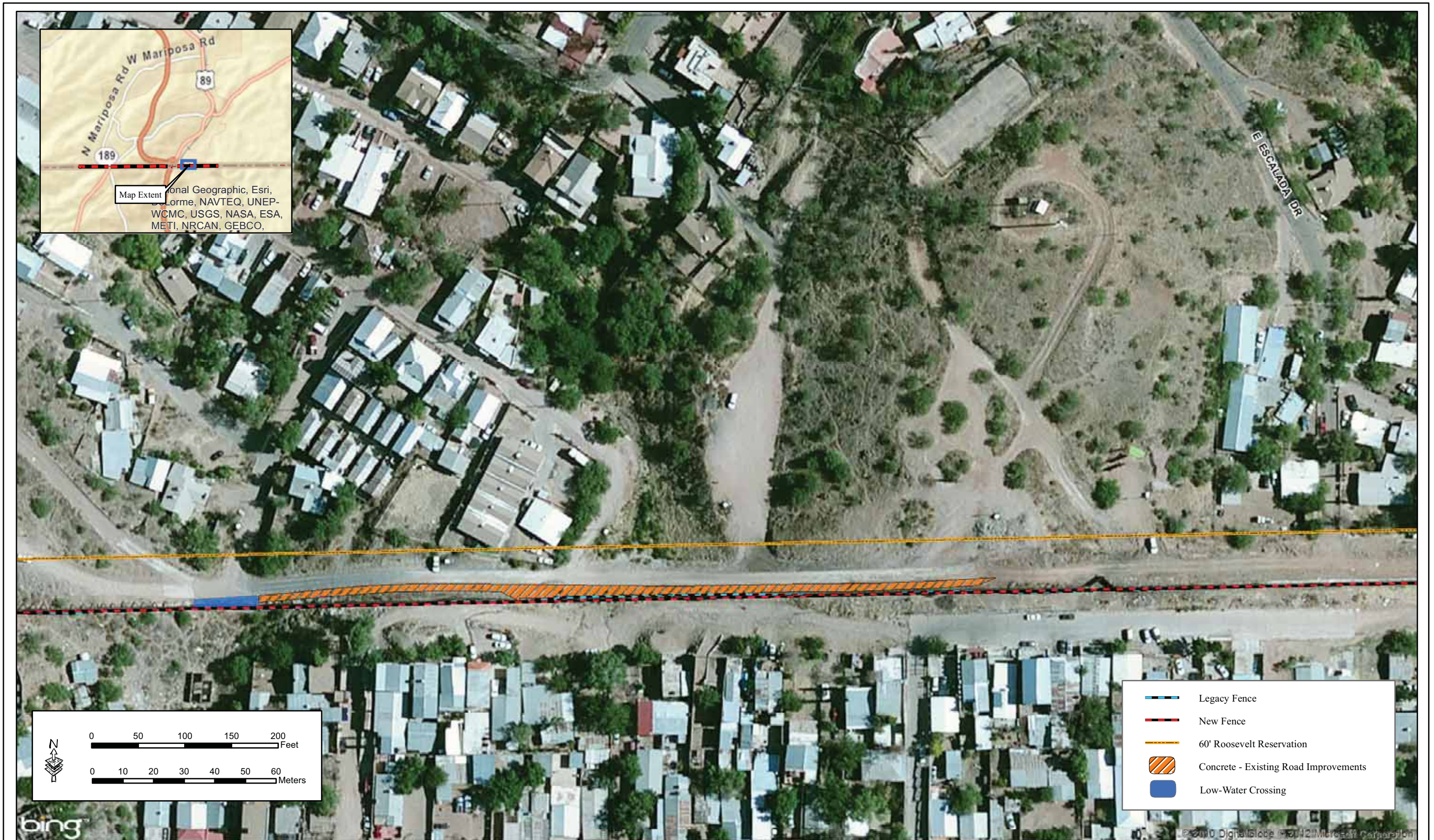


Figure 10. Corridor Map 9



Figure 11. Corridor Map 10



Figure 12. Corridor Map 11



Figure 13. Corridor Map 12