



November 6, 2018

Paul Enriquez
Acquisition, Real Estate and Environmental Director
Border Wall Program Management Office
U.S. Customs and Border Protection
U.S. Border Patrol Headquarters
1300 Pennsylvania Ave. 6.5E Mail Stop 1039
Washington, DC 20229-1100

Re: FY18 RGV Border Construction Projects

Dear Mr. Enriquez:

We, the Coalition for American Heritage (“the Coalition”), strongly object to any waiver of crucial historic preservation and environmental laws to expedite the construction of barriers along the U.S. – Mexico border. Waiving these laws endangers irreplaceable cultural heritage resources, including numerous archaeological sites that would otherwise be considered for interpretation prior to construction.

The Coalition for American Heritage is made up of more than 300,000 heritage professionals, scholars, small businesses, non-profit groups, and history-lovers from across the country who work together to support and promote our nation’s commitment to historic preservation. Many of our members serve as consultants to project applicants engaged in federal projects and facilitate compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

Under the Archaeological Resources Protection Act, the National Environmental Policy Act and the National Historic Preservation Act (NHPA), the federal government is required to protect archaeological resources in its jurisdiction from destruction, and to ensure that federal agencies take into account the effect their actions, including the licensing, permitting, and funding of projects, may have on these sensitive resources. These laws ensure that the American people have an opportunity to assess the costs and benefits of new development, and to consider alternative approaches if warranted.

Rather than waive applicable federal laws, U.S. government agencies should use existing mechanisms under current law to proactively identify cultural resources before any construction occurs, especially to mitigate costly delays. To conserve these sensitive resources, it is essential that local communities continue to exercise their rights to consult on the projects and express their views on the best way to protect irreplaceable national archaeological treasures.

The U.S. – Mexico border passes through lands that are among the richest in archaeological heritage in North America. Humans have inhabited this region for many thousands of years, long before recorded history. The archaeological record that both ancient and more recent inhabitants left behind—much of it yet to be

discovered—is often the only evidence we have of their existence. Not all sites will warrant preservation, but surveys must be conducted to ensure we protect those that yield important historical information and artifacts. If these sites are damaged or destroyed without examination, the information they contain is lost forever, and our knowledge of America’s past and our collective history is irreparably diminished.

The Coalition is aware that environmental and cultural resources surveys have been conducted within the border corridor previously; however, construction at the scale proposed for the barriers without environmental review is likely to disturb or destroy sites that the federal government may not be aware of (e.g., in numerous staging areas). This needlessly violates the commitment the federal government has made to consider the impacts of its projects on cultural resources and communities. The Coalition recommends environmental monitoring of existing natural and cultural resources, and survey of the many areas needed for staging equipment and personnel of such a monumental project if they have not been surveyed already. We believe that the review process under Section 106 of the NHPA has a proven track record of successfully identifying potentially irreparable harm to vital cultural resources in a timely manner that is fair to all stakeholders.

To prevent the permanent loss of sensitive historic and cultural resources, we urge U.S. government agencies to refrain from waiving these vital historic preservation and environmental laws and instead engage in meaningful consultation to expedite construction efforts.

Sincerely,



Marion Werkheiser
Policy Director
Coalition for American Heritage
www.heritagecoalition.org