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WASHINGTON, D.C. 20503

August 29, 2014

Diane Austin, Ph.D.  
Good Neighbor Environmental Board c/o EPA  
EPA East Building, Room 1102  
Mail Code 1601 M  
1201 Constitution Avenue, NW  
Washington, DC 20004

Dear Dr. Austin:

Thank you and the Good Neighbor Environmental Board for the 2013 Advice Letter to the President. The President and his Administration are committed to working across the Federal family to ensure security at the border while also safeguarding the environmental quality of treasured natural resources.

President Obama has made border health and security a top priority for this Administration. As part of such ongoing efforts, CEQ hosts regular meetings of the Southwest Border Interagency Working Group (SBIWG). The recommendations provided in the GNEB 2013 'Advice Letter to the President' are much appreciated as the SBIWG and Administration continues to tackle challenging environmental priorities along the U.S.-Mexico border.

The White House Council on Environmental Quality has coordinated this response to GNEB's letter with the Department of Homeland Security (DHS), Department of the Interior (DOI), U.S. Department of State (State Department), National Oceanic and Atmospheric Administration (NOAA), Department of Agriculture (USDA), Department of Transportation (DOT), and the Department of Housing and Urban Development (HUD).

The following highlights Administration actions or suggestions pertaining to GNEB's recommendations:

- 1. All U.S. Federal agencies working in the U.S.-Mexico border region should increase interagency collaboration regarding ecological restoration and by June 2014 should draft a blueprint for action, including goals, metrics and protocols for achieving short-, medium- and long-term progress.***

The GNEB's recommendation that the Federal government increase interagency collaboration regarding ecological restoration resonates strongly with the priorities of the



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Obama Administration. Undoubtedly, illegal border activity has had a negative impact on borderland ecology and will make restoration difficult. However, restoration projects continue to take place where feasible. Regarding GNEB's suggested "blueprint for action," Agencies propose to evaluate a number of ongoing activities, with an aim toward development of a blueprint in the future. A few activities, recommended by the Department of Interior, that could fit well with future efforts to develop a "blueprint for action" are:

- Identify appropriate data sets across bureaus and Landscape Conservation Cooperatives to identify the status of restoration needs.
- Apply an ecological integrity framework as used in the Bureau of Land Management's (BLM) Ecoregional Assessments, the National Park Service's (NPS) Energy Landscape Assessments, and the Bureau of Reclamation (BOR) Lower Colorado River species assessments to draft goal and metric structuring.
- Incorporate data and models from U.S. Geological Survey (USGS) Climate Centers to identify long term outcomes that will be sustainable under multiple global change regimes considering pervasive contaminants, biological invasions, fragmented habitats, and climate change.
- Evaluate current stressors and capacity to address short term stabilization needs such as fuel treatments, invasive species management, water supplies to ecosystems and communities, and native plant material. Also evaluate capacity to obtain science, develop quality plans, implement and monitor actions.

In addition, the Department of Transportation notes that its "Eco-logical" approach, led by Federal Highway Administration (FHWA) in partnership with seven other Federal agencies, is a process that the Department emphasizes across all projects. This approach promotes ecosystem-based mitigation and integrating plans and data across agency and disciplinary activities. The FHWA is collaborating with transportation, resource and regulatory agencies to implement the Eco-Logical approach.

***2. The U.S. Department of Homeland Security (DHS) should continue to consider environmental protection in operations and continue environmental protection training as a component of its efforts to mitigate damages to natural resources. Training should be adaptive in light of changing conditions along the border.***

The Department of Homeland Security's Customs and Border Protection (CBP), continues to consider environmental protection in all of its activities. This year, U.S. Border Patrol's Public Lands Liaison Agent (PLLA) Program implemented the "Have You Seen Me" Campaign, which is a joint effort between the U.S. Fish and Wildlife Service and the Border Patrol's PLLA Program Offices in the Tucson and Yuma Sectors. Information is provided through Border Patrol Sector Information Display Systems and at all Border Patrol Stations within each of the two sectors. CBP will capitalize on this delivery system to expand the campaign to include archeological and paleontological resources, smuggling of threatened



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and endangered species, and other areas of training or information that may be relevant to the changing conditions of the border. Thousands of Border Patrol Agents will now have this vital information available to them.

Customs and Border Protection has expanded its environmental protection and awareness training along the border to best prepare Border Patrol Agents for environmental security. In a pilot program, training for new Border Patrol Agents within the Yuma Sector is expanding on cultural and environmental issues beyond the currently required Environmental Cultural Stewardship Training Virtual Learning Course which was created in partnership with DOI. The training is tailored to the local area and is flexible to allow for the changing border conditions. This holistic approach will require that each new agent participate in a training session provided by the local PLLA to learn about sensitive cultural or ecological resources that may be present within their area of responsibility.

Additional expanded training efforts include:

- The Archaeology and Paleontology for Law Enforcement Officers course, which is a joint CBP and Bureau of Land Management class. The first training will be offered in May 2014, and will have in attendance Border Patrol agents from four sectors and the National PLLA Program Manager.
- Beginning in August 2014, all individuals assigned as a PLLA Border Patrol Sector Representative will be required to attend a 3-day PLLA Environmental Overview class developed in coordination with our Federal land management partners from the Fish and Wildlife Service and Bureau of Land Management.
- Environmental Best Management Practice training and education for field personnel who are involved in construction, maintenance or repair projects. This training is held both quarterly and at the initiation of each project on the southwest border so personnel can be notified of any Best Management Practice or environmental requirements generally or specifically required during execution of the project.

Customs and Border Protection continues its partnership with DOI bureaus along the southwest border to execute replanting projects and monitor their success as mitigation for CBP impacts. Projects include those noted previously such as the A-1, Smugglers Gulch, and Border Infrastructure System. Additional projects such as West Desert Road in El Centro Sector, West Access Road in San Diego Joint Sector, the Bureau of Land Management partnered 100+ acre Limitroph project along the Colorado River, Fronton Road in Laredo Sector, and Riverbend Road in Rio Grande Valley are all forecast within the next fiscal year (dependent on funding). The CBP previously provided over \$1 million in funding to the National Park Service for re-vegetation projects in the Organ Pipe National Monument area.

Agency wide, NOAA is promulgating the implementation of the National Fish, Wildlife and Plant Climate Adaptation Strategy, which provides approaches for reducing negative impacts



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of climate change on fish, wildlife, plants, and the natural systems upon which they depend. A key component of advancing the strategy is training of NOAA staff and partners. For example, NOAA's Tijuana River National Estuarine Research Reserve has been an active participant in environmental protection, research, education and training along the southern California border with Mexico, and will continue to engage as possible with GNEB actions focused on that range of the border.

The Department of Transportation is partnering with the Transportation Research Board (TRB) and the American Association of State Highway and Transportation Officials (AASHTO) to promote best practices and train transportation planners in the Eco-Logical framework, nationwide. To further promulgate this approach, FHWA is developing incentives and support for state and regional transportation agencies to adopt a regional ecosystem framework or integrate elements of the Eco-Logical framework into standard operating procedures. FHWA will continue to partner with TRB and AASHTO to develop techniques and tools to help practitioners integrate environmental considerations into transportation planning and projects.

- 3. EPA's Border 2020 program should expand the framework to develop performance metrics to include specific ecological restoration and maintenance. This will help ensure that ecological systems along the border remain viable.***

Federal Agencies will continue to support EPA's Border 2020 initiatives, including coordinating with EPA on an extended framework for performance metrics, as appropriate. For instance, where the Tijuana River National Estuarine Research Reserve has partnered with Border 2020 in its action planning, NOAA may contribute to relevant portions of such an extended framework. In this case, the downstream/estuarine impacts of upstream water removal for multiple purposes, and excessive erosion and pollution, pose threats to the health of estuarine and ocean species dependent on the estuary for their survival, including valuable commercial and recreational fisheries. NOAA will work closely with the GNEB subgroup focused on metrics for ecological restoration as part of its contributions to the annual GNEB report to the President.

- 4. The U.S. Federal natural resource agencies and the International Boundary and Water Commission, United States and Mexico (IBWC), in collaboration with U.S. state agencies and U.S. tribal nations in the border region, should develop metrics, standards and models for environmental flows for use in water planning. They should identify lessons learned for potential use in border watersheds, which should incorporate the recognition of the sovereignty of U.S. states and tribal nations regarding water rights. Needed information includes analysis of the range of flow characteristics such as peak flow and monthly flow variation, as well as base flows, to support planning for allocations, wildlife needs, recreation and treatment capacity.***



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Agencies are working hard to develop this information and make it widely available. A variety of Federal natural resource agency programs are currently in place that contribute to water planning along the border. The three National Weather Service River Forecast Centers (RFC) in the U.S-Mexico border region (California-Nevada, Colorado Basin, and West Gulf) provide information on river flow observations and forecasts. Additionally, the interagency National Integrated Drought Information System (NIDIS) can provide current and forward-looking drought information to decision makers to assess drought risks and prepare for and help mitigate the effects of drought. NOAA's Climate Prediction Center may provide seasonal to inter-annual outlooks on various climate variables, and the Climate.Gov website, which includes numerous NOAA climate resources, provides timely and authoritative scientific data and information about climate.

- 5. U.S. Federal agencies, such as the U.S. Geological Survey, Bureau of Reclamation, U.S. Fish and Wildlife Service and IBWC, as well as U.S. state and Mexican stakeholders and tribal partners, should participate in U.S. state environmental flow reviews as permitted by state law. Where no U.S. state environmental flow review or process is occurring, these Federal agencies should convene basin-wide analyses of environmental flows that are developed with Mexican, state and tribal partners to help identify the quantity, timing and quality of flows, as well as beneficiaries of these ecosystem services, within the framework of existing governing agreements and treaties. These analyses should be shared with U.S. states undertaking environmental flow reviews when and if they occur. Federal agencies should apply lessons learned from the Colorado River Basin Water Supply and Demand Study when conducting these analyses.*

Federal Agencies have a variety of programs in place that provide technical information for the environmental flow review process. Additionally, agencies are willing to participate in joint efforts to review flows consistent with their authorities and in coordination with state partners as agencies understand the importance of a broad sharing of the methodologies employed and the data developed in the course of the planning and execution of environmental flows. As resources permit, and consistent with existing obligations among the parties, this would include identifying relevant lessons for the border environment.

- 6. To develop potential solutions that protect or improve the ecological condition of resources of the Colorado River Basin, the U.S. Department of the Interior (DOI) should continue to provide institutional and technical support to the Colorado River Basin Water Supply and Demand Study and other efforts to gain information for better management of border watersheds and water bodies. The solutions examined and adopted in such studies should include those that promote healthy river flows in the Colorado River Basin. DOI should disseminate results of the Colorado River Basin Water Supply and Demand Study to*



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*stakeholders in other border watersheds through other agencies such as the IBWC.*

Federal agencies support continuing and expanding cooperation to gain information for better management of border watersheds and water bodies. The recent work related to the Lower Colorado River Pulse study is an example of how DOI bureaus are assisting in improving ecological conditions in the southwest border region. Additionally, NOAA has several programs in place to provide critical data to support management of border watersheds and water bodies.

- 7. The U.S. Federal government should work with Mexico to coordinate releases from Mexican dams in a planned fashion to meet the dual purpose of water delivery to the United States and transboundary ecological benefits for the Rio Grande ecosystem, particularly in the area of Big Bend National Park and adjacent protected areas in Mexico.***

The U.S. Section of the International Boundary and Water Commission, together with the Mexican Section of the Commission, has developed a proposed methodology for achieving predictable water releases from Mexican dams. The Department of State supports the IBWC's efforts to negotiate an agreement employing such a methodology and to secure endorsement thereof by the respective governments. Additionally, the DOI bureaus, particularly USGS and BOR, are ready to assist as resources allow.

- 8. The Border Environment Cooperation Commission (BECC) and North American Development Bank (NADB) should use best practices to measure the environmental effects and benefits of the projects that the BECC and NADB support, as well as to look for ways to advance viable projects that could contribute to ecological restoration through grant opportunities supported by existing programs, including the Border Environmental Infrastructure Fund (BEIF), Border 2020, and Community Assistance Program (CAP), or new sources.***

BECC and NADB projects are increasingly incorporating environmental analysis into project planning. The BECC assesses the environmental and health impacts of any project under consideration, either for grant or loan funding, as part of its project certification process. This analysis is summarized in the project documentation made available to the board before a project is approved. Typically, the USG board members (particularly EPA) will engage with the BECC on this analysis, asking questions, seeking clarification as to the BECC's methodology or assumptions, and recommending improvements. In addition, and as a direct result of pressure from the USG agencies on the BECC/NADB board, the two institutions have recently taken steps to establish a results measurement framework and have added *post-project* evaluation and reporting to their standard procedures.



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Although ecological restoration is not singled out as an explicit goal of the BECC/NADB's work, many of the projects that the BECC and NADB support reduce pollution and thereby enable ecological restoration to take place. For example, the board recently approved NADB funding for the rehabilitation and upgrade of the wastewater treatment system for the city of Holtville, CA. In its current condition, the system has inadequate capacity and discharges non-complying effluent into the Alamo River and to the Salton Sea. While the NADB-funded project will not clean up the pollution that has already been released into this waterway, it contributes to a healthier ecosystem by ensuring that fewer pollutants will enter the waterway in the future.

***9. The U.S. Federal government should work with local and state stakeholders to support efforts to use treated effluent for ecological restoration, including through the BECC and NADB.***

The BECC and NADB do not specifically seek out projects that include the use of treated effluent for ecological restoration, although this method would be in line with the overall goals of the institutions. Discussion with these boards will continue.

***10. Because of the transboundary reality of ecosystems in the border region, the U.S. Federal government should support efforts to improve urban ecological conditions through binationally coordinated watershed councils in places where urban sprawl is taking place, such as the canyon lands of Tijuana and the river valley of Ciudad Juárez. Such councils encourage citizen science and participation in transboundary ecological stewardship.***

Federal agencies support efforts to improve urban ecological conditions through binationally coordinated watershed councils and will participate to the extent that authority's allow. For example, NOAA directly supports the efforts of the Tijuana River Valley Recovery Team through funding and oversight of the Tijuana River National Estuarine Research Reserve. NOAA will continue to engage in ecological stewardship in the San Diego region as it is a high priority management need for this reserve program.

***11. The U.S. federal government should conduct and support research that assists ecological restoration of water bodies, their associated habitats and resultant decisions regarding their management. There is an ongoing need for research regarding such key issues as surface water- ground water interactions in the border region, ground water availability, invasive species control, and how the volume and timing of water releases from reservoirs can impact habitat. There also is a need to link existing models of ecological planning and restoration to border ecosystems.***

Select Federal agencies are in a position to conduct and support research surrounding key water issues. The Invasive Species Program of the National Marine Fisheries Service



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(NMFS) Restoration Center, for example, coordinates prevention, early detection, rapid response, control, and monitoring of aquatic invasive species; supports research and monitoring efforts that investigate the impacts of aquatic invasive species on ecosystems and socioeconomics; and provides technical support and best management practices regarding the prevention and spread of invasive species. National Ocean Service's (NOS) National Estuarine Research Reserve System (NERRS) conducts and supports research on habitat restoration and can contribute to research needs as NERRS restoration science priorities align with regional issues. The interagency NIDIS program can provide critical information on expected drought conditions, including early warning indicators that may be useful for water regulators to consider in managing in-stream and downstream water budgets and impacts on the needs of riverine, estuarine, and coastal species.

Additionally, DOI can evaluate existing information gaps and plans to provide such an evaluation to the GNEB to identify strategic needs across border sectors on public and private natural areas and in urban neighborhoods. The Lower Colorado Pulse Flow study is a good example of this type of research where USGS and BOR are actively involved in and will continue to monitor habitat and hydrologic impacts of the pulse flow study.

***12. To increase the implementation and success of environmental restoration activities in the U.S.- Mexico border region, the U.S. Federal government should support ongoing efforts to foster transboundary watershed management and ecology studies. These studies can increase understanding of how natural and man-made watershed structures and natural processes interact. With this information, we can better predict how human activities impact—and ecological restoration activities improve—the condition of a watershed. Watershed studies are critical to understanding the reasons for impaired sources of surface water, as well as to looking at the future and understanding how alternative structural or management initiatives can make water available for many uses, including environmental, agricultural and industrial.***

Federal agencies welcome the opportunity to work across international borders and in many cases, transboundary programs are underway. DOI researchers and managers regularly meet and collaborate with Mexican counterparts. However, additional work would need to be authorized through the Department of State as well as mutual agreement of both the U.S. and Mexican legislative and executive branches. DOI bureaus have had some success working with Mexican counterparts in the Big Bend region (Big Bend National Park), the Rio Grande Valley of South Texas, and in the San Diego area. However, these efforts have been challenging due to funding issues on both sides of the border as well as high levels of illegal activity in some areas which has limited cross border travel.

NOAA has the authority to provide expertise and guidance on natural and nature-based infrastructure solutions and ecosystem valuation studies. Within NOS, the National Centers





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for Coastal Ocean Science conducts research on coastal pollution and ecosystem characterization, providing critical information for community and natural resources management decisions.

***13. The U.S. Federal government should support development and fund the acquisition of the data necessary to measure the effectiveness of ecological restoration programs and activities. A cohesive, comprehensive data collection program is paramount to the success of any ecological restoration activities along the U.S.-Mexico border.***

Federal agencies recognize the need for a comprehensive data collection and research program along the border and will continue to seek opportunities for continuing and expanding efforts. The DOI Lower Colorado River Pulse Flow study is the latest example of this effort. Although limited in scope to one portion of the border, it will provide valuable information on the ecological restoration of riparian habitats and hydrology of the riparian zone. The DOI will be able to report on the results of this study and any other work along the border at the request of the GNEB. NOAA bureaus and agencies such as NOS and NMFS conduct habitat restoration and collect information on the effectiveness of ecological restoration programs and activities. Both programs can contribute relevant information as it becomes available.

In closing, I want to again thank you for the board members' dedicated service on the Good Neighbor Environmental Board. Your expert advice is an invaluable resource that helps make our government do its business better. We are fortunate to have your counsel, and look forward to the board's continued engagement.

Sincerely,

A handwritten signature in black ink that reads "Michael Boots". The signature is written in a cursive, flowing style.

Michael Boots  
Acting Chair