



October 17, 2025

U.S. Customs and Border Protection  
U.S. Border Patrol Headquarters  
Program Management Office Directorate  
1300 Pennsylvania Ave. 6.5E Mail Stop 1039  
Washington, DC 20229-1100  
ATTN: Michelle Barnes

*Via email:* SanDiegoComments@cbp.dhs.gov

Re: Comments on proposed border barrier and options to prevent a permanent, impermeable barrier to wildlife along the California – Baja California border

Dear Michelle Barnes,

On behalf of the undersigned organizations and individuals, we respectfully submit the following comments in response to the U.S. Department of Homeland Security's issuance of environmental waivers and the proposed construction of additional border barrier infrastructure along California's border with Baja California. Our organizations collectively represent decades of expertise in wildlife conservation, environmental science, habitat connectivity, and binational ecological restoration across the U.S.–Mexico borderlands. Based on our expertise, we provide cost-conscious recommendations that will improve habitat connectivity for species, while still meeting security needs along our border where possible.

The U.S. Department of Homeland Security (DHS) has announced plans to close the last remaining gaps in California's border wall—sections that serve as the only remaining pathways for wildlife to move between California and Baja California. These unfenced areas are essential for the survival and genetic health of Peninsular bighorn sheep, mountain lions, and mule deer, as well as countless smaller species that depend on cross-border access to food, water, and mates.

California's borderlands are ecologically vital, serving as the last remaining transboundary wildlife corridors for several imperiled species. The expansion of border barriers through these landscapes threatens to sever critical connections between habitats, fragment cross-border wildlife populations, and undermine species' ability to seek out new habitat and resources to adapt to human development. These expected consequences are [supported by data and recognized by over 2,500 scientists](#). While we recognize the operational mission of U.S. Customs and Border Protection (CBP), we strongly urge that decisions around border infrastructure incorporate science-based, site-specific mitigation strategies that balance security concerns with long-term ecological function.

The comments below outline specific recommendations to limit ecological damage, preserve cross-border habitat connectivity, and support the survival of at-risk species. These include technical design modifications, recommended locations for wildlife permeable infrastructure, and collaborative management opportunities with state, federal, and binational partners. We appreciate the opportunity to provide input and urge CBP to meaningfully consider these recommendations<sup>1</sup> during project planning and implementation.

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<sup>1</sup> Prepared by: Christina M. Aiello ([christina@wildlandsnetwork.org](mailto:christina@wildlandsnetwork.org)), Wildlands Network, California Program

**1. New border wall projects in California threaten the last remaining cross-border wildlife corridors for large mammals like Peninsular bighorn sheep, mountain lions, and mule deer, undermining population viability, genetic flow, and recovery efforts.**

The areas planned for new barriers (Figure 1) are the last remaining wildlife corridors across the border, with movement data confirming their use in some cases. The pedestrian fencing used to wall the US-Mexico border will [prevent or significantly reduce wildlife movement across the border](#) (depending on species body size and behavior), affecting species already impacted by human development in the region. California's borderlands play a significant role in the larger ecosystem and provide valuable resources to both wildlife and the public – we ask that stakeholders that manage, value and benefit from these natural resources (represented by co-signers of this letter) be considered and that CBP incorporates *solutions that can limit the extent of the damage*. We have summarized our recommendations below and compiled an in-depth review of research that supports our statements and requests (attached supplement).



**Figure 1.** Existing border wall along the California–Baja California border. The four regions circled are currently unfenced but construction projects announced as of September 23, 2025, will close most wall gaps (bright red lines). Waivers and projects were initially announced from the coast to border monument 231 (bright red circle) but have since been extended to include all California border including the Jacumba Wilderness.

**At a minimum, we ask DHS to consider all opportunities to add small wildlife passages to improve movement across the border wall.** Small-medium species (e.g., bobcats, skunk, coyote, badger) benefit from small openings (wildlife passages) unusable by humans for crossing. Despite their demonstrated effectiveness, they have not been incorporated into border wall designs without litigation. Incorporating wildlife passages earlier on in the building process could prevent costly and time-consuming litigation and still meet security goals.

**Where possible, we also ask DHS to consider habitat connectivity needs of larger wildlife species.**

Three species living along the border in California are at-risk and/or ecologically important large mammals that require large landscapes and movement between subpopulations. They cannot fit between border fence bollards or small wildlife passages and currently rely on the small percentage of open border to access historical habitats and connect populations throughout the Californias.

- *Endangered Peninsular Bighorn Sheep* have a home range centered on an unfenced section of the border – spending half their time in the US and half in Mexico. This movement across the border provides essential north-south connectivity between all remaining peninsular bighorn populations. A closed border would isolate California's bighorn from core habitat, water resources, and a source of migration and genetic diversity, jeopardizing recovery efforts for this imperiled species.
- *Mule Deer*, a valuable big game and prey species, occur along the border from the coast to the desert. Connectivity models predict that deer in California have the highest movement potential where existing fence gaps occur while elsewhere expanding cities and roads are fragmenting their habitat and shrinking available movement corridors.
- *Mountain Lion* populations in Southern California are fragmented and have been proposed for listing as threatened under the California Endangered Species Act. Movement between California and

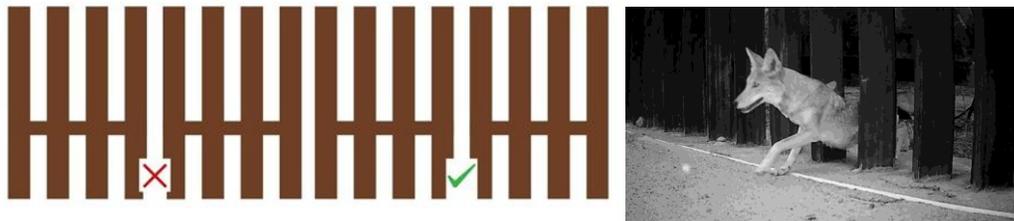
Baja California adds new genetic material to populations suffering from inbreeding and associated health risks. A collared male lion made such a movement across sections of unfenced border that it could not have made through the small openings typical in border pedestrian fence (Figure 3).

- 2. CBP should incorporate design modifications—such as small wildlife passages and wider, unobstructed inter-panel gaps—to allow small- to mid-sized animals to safely cross the border barrier.**

Based on recently published research ([Harrity et al. 2024](#)) and ongoing camera surveys of the border wall, we recommend the following design changes be applied to new fencing at all planned locations in California to benefit small to mid-sized species including coyote, badger, bobcats, etc., small puma, and possibly small deer. We also recommend retrofitting existing panels with openings at targeted locations in collaboration with wildlife agencies and other stakeholders.

- 1. Frequent installation of 8.5x11-inch wildlife passages\*:**

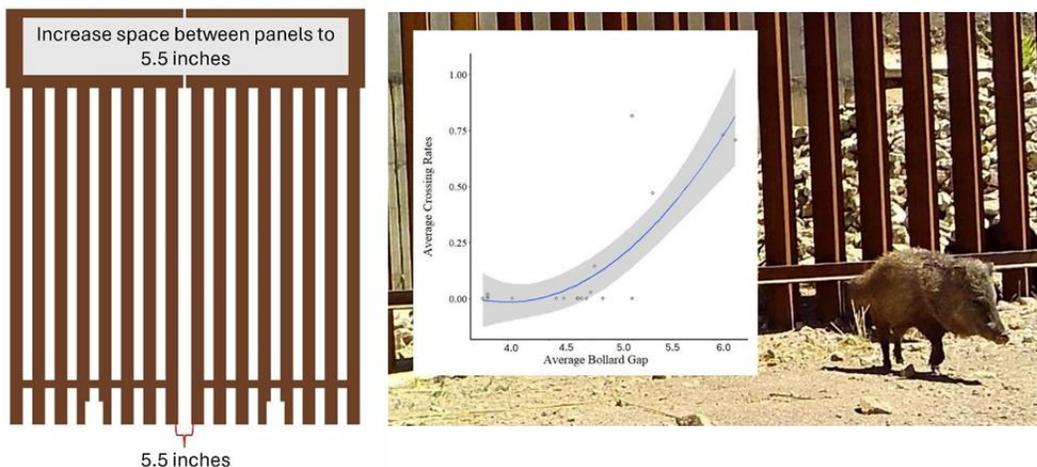
- Install wildlife passages in every panel where possible and at least every 0.25 mile
- Install wildlife passages in a variety of habitat types and elevations
- Ensure approach to the passage is free of obstruction (e.g., avoid placing next to rip-rap)
- Do not install horizontal support bars above small wildlife openings as this makes them harder to find for taller animals (e.g., mountain lions, coyotes, etc.)
- Cut openings flush to the ground and ensure edges are smooth



\*No humans have been observed using such structures during 3 years of ongoing monitoring that totals over 6000 camera-days at wildlife openings

- 2. Increase spacing between prefabricated panels to increase wildlife passage:**

- Increase the spacing between prefabricated panels to at least 5.5 inches (Figure 2)
- Trim horizontal support bars so that the vertical space between panels is unobstructed

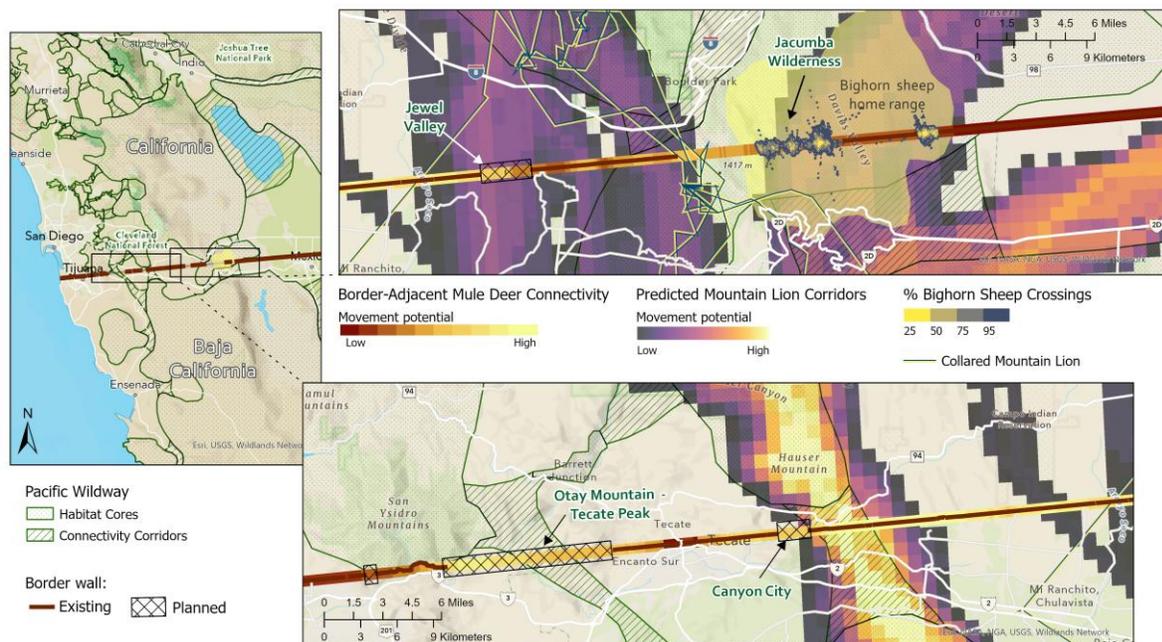


**Figure 2.** Average crossing rates for javelina increase when the inter-panel spacing is greater than 5.5 inches. Data from cameras along the border wall in Arizona (Wildlands Network & Sky Island Alliance).

**3. CBP should consider needs of large species highlighted (bighorn sheep, mule deer, mountain lion) and retain fence gaps or larger wildlife-targeted openings where alternative security approaches can meet operational needs**

Based on extensive research and monitoring conducted on these three species (and further described in a supplemental document), we specifically recommend CBP:

1. Keep the Jacumba Wilderness unfenced to preserve crucial Peninsular bighorn and mountain lion movements and habitat connectivity along the least developed binational wildlife corridor. If additional walls are imminent in this region, see recommendation #2
2. For planned areas of new wall: retain a continuous opening OR add large wildlife openings – floodgates or other openings large enough to accommodate the largest sex/age class – where there is evidence of present or potential use by large wildlife and/or riparian areas (Figure 3)
  - Keep at least 1 floodgate per location open year-round and select gates that are not at the drainage bottom, so they are accessible even during high flow events.
  - Select floodgates with as few obstacles for wildlife as possible. For example, open gates with low cement footers and an approach that is clear of rip-rap



**Figure 3.** Compiled data describing 1) a potential international network of wildlife habitat and corridors that link them across all Pacific states and provinces (Pacific Wildway), 2) Peninsular bighorn sheep movements recorded by GPS collars that show regular use of an unfenced gap in the Jacumba Wilderness (% Bighorn Sheep Crossings; home range), 3) a male mountain lion's movements across the border using various fence openings (Collared Mountain Lion) as well as predicted mountain lion movement corridors across the border (Predicted Mountain Lion Corridors) and 4) predicted mule deer movement potential near each 100 meter segment of border (Border-Adjacent Mule Deer Connectivity). See supplemental document for full details.



**4. Failure to adopt these recommendations would sever cross-border populations, degrade ecological function, jeopardize decades of conservation investment, and permanently reduce binational biodiversity resilience.**

- Peninsular bighorn sheep recovery and conservation in the US and Baja would be jeopardized; severing a cross-border population and their access to resources while also splitting the range of Peninsular bighorn in two – reducing the long-term resiliency of populations in both the US and Mexico from existing threats, like drought and disease, countering decades of conservation efforts and progress
- The primary large prey and huntable species in the region – mule deer – would lose access to habitat and resources across the border; affecting a resource that supports other species (mountain lion) and a source of revenue that supports local communities and state management funds
- Fragmented Southern California mountain lion populations would lose a genetic lifeline and further increase their risk of decline and extinction in the region; human development that limits mountain lion movement has already contributed to low genetic diversity, inbreeding and observed birth defects in adjacent populations. Even rare cross-border movements – like the male documented using border wall gaps – can improve outcomes for the region’s top predator
- Efforts to create habitat connectivity on a continental scale would exclude Mexico – altering the ecology and evolutionary future of biological communities along the border
- Ecological and economic benefits from decades of investments in binational conservation would be reduced – which includes over 27,000 acres of land conserved to support biodiversity and recreation

Given the extraordinary ecological value of California’s remaining borderland wildlife corridors—and the well-documented threats posed by impermeable border fencing—we urge CBP to incorporate science-based, location-specific design solutions that preserve habitat connectivity for these species. These recommendations are both feasible and necessary to ensure that border infrastructure decisions are compatible with environmental stewardship obligations. We welcome the opportunity to collaborate further and encourage CBP to consult with wildlife experts, agencies, and binational partners to minimize long-term ecological harm caused by completion of the border wall.

Thank you for your consideration.

Sincerely,

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