★ TEXAS BORDER COALITION

MEMORANDUM

TO: Russell Frisbie, Office of Mexican Affairs, Department of State
FROM: Billy Moore
SUBJECT: Floodplain Structures in Rio Grande City, Los Ebanos and Roma
DATE: September 21, 2012

We believe IBWC's sanction of bollard fencing in the Rio Grande flood plan is wrong with impacts that are potentially life and property threatening.

IBWC Commissioner Drusina justified the decision earlier this week saying the design changed, but there is no new design. The IBWC analysis justifying the structures states that the wall will be identical to the bollards erected in Cameron County – six inch by six inch, 18 feet tall spaced 4 inches apart. Years ago there was a temporary wall design, but it was withdrawn after being ridiculed and the original bollard design was reinstated. The old design was approved by IBWC.

At IBWC's September meeting in Rio Grande City to explain the decision, landowners asked whether there had been any surface surveys that would describe access and impacts to their property. IBWC had no response.

The manager for Rio Grande City's international bridge asked about access the riverbank to carry out ongoing erosion control efforts. IBWC had no response.

Residents asked whether walls crossing the washes that flow into the Rio Grande might become blocked with debris, preventing normal drainage and causing flooding. In response, IBWC admitted that CBP had never provided a design specification, so that question could not be answered either.

What changed was the flood model. The new model assumes, without explanation or justification, that a bollard fence erected parallel to the river clogged with debris would at most block 10 percent of flow; where it is perpendicular it would block 25 percent of the flow. In 2008 the same analyst, Baker Engineering, reviewed the same wall design in the same locations and concluded that parallel segments would block 85 percent (Roma), 67 percent (Rio Grande City) and 36 percent (Los Ebanos) of flow; perpendicular segments were

"modeled as completely blocked, primarily due to the hydraulic effects of bollards themselves." That means the clogged debris would be redundant and 100 percent blockage by the bollards could be surpassed.

On the ground evidence detailing the actual impacts of the same design crossing actual washes in Arizona and California in 2009 demonstrated complete blockage resulting in millions of dollars in physical damage.

When asked for justification of the revised assumptions, IBWC had no response. When the Mexican IBWC asked the US IBWC to justify these assumptions, the meeting notes say, "It was explained that the U.S. Department of Homeland Security (DHS) wanted minimum debris blockage and a percentage that was felt to be reasonable was agreed upon in the meeting on February 23, 2011, during which the modeling methodology was finalized between USIBWC, DHS, the U.S. Army Corps of Engineers and Michael Baker Jr., Inc."

We agree with the Mexican section of the IBWC in rejecting assumptions set by the Department of Homeland Security. By adopting these assumptions and sanctioning the structure, we suggest the US IBWC decision will result in the loss or gain of territory by the United States and Mexico incident to future changes in the river, the endangerment of crops, livestock, people and communities.

Based on the evidence, IBWC consistently rejected unilateral action approving these structures through 2011, pointing out the likelihood of "substantial increases in water surface elevations and deflections of flow at several points of all three projects." This is not speculation. After hurricane Alex and a tropical depression roared into the Rio Grande Valley in 2010. Overflowing waters took 12 lives and forced the mandatory evacuations of Los Ebanos and parts of Rio Grande City.

Between the disapproval and approval of these structures by the IBWC, no evidence changed, only flow deflection assumptions - at the specific urging of the Department of Homeland Security to obtain a predetermined outcome.

We request responses to questions that the IBWC has chosen not to answer:

- Is there scientific evidence to justify the assumption that a bollard fence erected parallel to the river clogged with flow debris will at most block 10 percent of flow; where it is perpendicular debris will block 25 percent of the flow?
- Is there a detailed description of the design changes CBP made between the previous structures and the one approved by the IBWC, as referred to by Commissioner Drusina?
- Have there been any surface surveys that would describe access and impacts to their property?

- Will access the riverbank be available to the operator of the Rio Grande City international bridge to carry out ongoing erosion control efforts?
- Will structures crossing the washes that flow into the Rio Grande become blocked with debris, preventing normal drainage and causing flooding?
- Has the IBWC conducted any analysis forecasting the changes in the Rio Grande's center point as a result of changing water flows caused by bollards and debris in a flood similar to Hurricane Alex 2010?
- Has the IBWC conducted any analysis forecasting loss of crops, livestock or people as a result of floods similar to the 2010 event?

Without adequate answers to these questions, the public is left to conclude that the decision to sanction these structures purposefully turned a blind eye to the preservation of American territory, the destruction of property, communities, and the endangerment of lives. The decision is not justified by facts or evidence and by all reason and rights should be reversed.