



November 29, 2021

Andria Strano
Acting Chief, Division of Humanitarian Affairs
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
5900 Capital Gateway Drive
Camp Springs, MD 20746

Lauren Alder Reid
Assistant Director, Office of Policy
Executive Office for Immigration Review
5107 Leesburg Pike
Falls Church, VA 22041

VIA ELECTRONIC FILING

Re: Deferred Action for Childhood Arrivals, CIS No. 2691-21; DHS Docket No. USCIS-2021-0006

Dear Ms. Strano,

As the Director of Litigation for the Center for Immigration Studies (CIS), I hereby submit this comment on behalf of Dolores Anna Chacon-Chavira and Rogelio Chavira in response to the department's request for comments on the Notice of Proposed Rulemaking (NPRM) titled Deferred Action for Childhood Arrivals, as published in the Federal Register on September 28, 2021. I hereby incorporate by reference CIS' comment submitted on November 29, 2021, as well, which is attached herein.

As private citizens who live on the border between Texas and Mexico, specifically El Paso, we personally experience the environmental effects of programs like DACA. When DHS unilaterally decides to grant benefits such as amnesty and work permits to illegal aliens if they have successfully made it across the border, it sends the unmistakable message to those contemplating making the trip that it is worth their while to cross, leading foreseeably to ever larger numbers of people crossing our property, interfering with our quiet enjoyment of our land and our sense of security. Furthermore, programs that cause more people to cross the border illegally effect fragile habitats on the border. Many southwest ecosystems are fragile and composed of an extraordinary and unique composition of native plant and animal species, many of which are protected under the Endangered Species Act. The amount of trash left by an increased border crossers alone is a significant environmental cost to our land which personally affects us.

In addition, the public health of the town we live in is greatly affected by the rush of migrants who have taken a precarious journey in close quarters, on their way across, those taken the journey are subjected to unhealthy and dangerous conditions, and often need physical and mental health services once they have reached the United States.



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When they are detained in our community, they greatly strain health resources such as hospitals and exacerbate public health crises, such as ongoing pandemics.

DHS is under a legal obligation to consider these potential environmental impacts as well under the National Environmental Policy Act (“NEPA”) before finalizing rules like DACA. If the proposed action is made final, it clearly has the potential to increase the border crisis even further. The environmental impacts of doing so must, at the very least, be considered in an Environmental Assessment before this rule is finalized.

Sincerely,

Julie Axelrod
Director of Litigation
Center for Immigration Studies