



Legal Services for Prisoners with Children
4400 Market Street, Oakland, CA 94608

June 1, 2026

Submitted via bop-adm-facilities-s@bop.gov

Federal Bureau of Prisons
Facilities Management, Construction and Environmental Review Section
320 First Street, NW, Room 418
Washington, DC 20534

RE: *Public Comment in Response to FCI Dublin Environmental Assessment – Proposed Action to Permanently Deactivate and Close the Federal Correctional Institution in Dublin, Camp Parks, California*

Dear Facilities Management,

On behalf of [Legal Services for Prisoners](#) with Children, I am writing to provide public comment regarding the Bureau of Prisons (BOP) “Environmental Assessment (EA) - Proposed Action to Permanently Deactivate and Close the Federal Correctional Institution (FCI) in Dublin, Camp Parks, California.”

The EA confirms that the FCI Dublin property is unsafe and uninhabitable and would cost tens of millions of dollars to repair, and supports BOP’s proposal to permanently close the prison. **Not only should it be closed, it should be demolished, and never used to incarcerate people again.**

Legal Services for Prisoners with Children (LSPC) is a California-based nonprofit organization with over four decades of experience championing the human rights of incarcerated and formerly incarcerated persons and their families. We advocate for releasing the community from the burdens of mass incarceration, restoring dignity and civil rights to those impacted by the criminal legal system, and reunifying families. Our work includes legal advocacy, policy

reform, public education and organizing directly impacted communities in partnership with hundreds of organizations and agencies across California and the country.

For over forty years, Legal Services for Prisoners with Children has been advocating for the safety and rights of people incarcerated in California and nationwide, including those imprisoned at FCI Dublin. Given the facility's history of unlawful and cruel sexual abuse targeting women detainees, LSPC believes that FCI Dublin **is not fit to serve as a custodial facility of any sort**. Tragically, women incarcerated at FCI Dublin have been subject to a pattern of sexual assault, which was ongoing for decades. Even after a number of brave survivors came forward thirty years ago, FCI Dublin officials were unable to halt the horrific abuse, which continued unabated. Ultimately, ten FCI Dublin correctional officers have been criminally charged for their sexual abuse of women incarcerated at the facility.¹ As of this year, nine of the ten have already pleaded guilty or been convicted for their crimes.²

Beyond the recent criminal prosecutions, brave testimony from the victims makes clear the facility's problems went far deeper than these ten individuals, leading to BOP's correct decision to close the facility in April 2024.

However, unused federal facilities are often transferred to another agency, which means that FCI Dublin facility could be re-opened as an immigration detention facility. ICE toured the facility and has refused to say they won't try to turn it into an immigration detention center. This would have devastating impacts on the local community's safety, resources, and environment. FCI Dublin was built nearly 50 years ago, and the buildings are crumbling and in poor condition. Leaving the facilities empty, and transferring the property as is, could lead to ongoing safety risks, environmental hazards, and a blight in the community. Beyond safety concerns for the surrounding community, there is little reason to think that patterns of sexual abuse against those detained in the facility would not emerge again, simply because the the facility is exchanged from BOP to ICE.³

In light of the history of sexual abuse by facility officials, the suffering endured by those incarcerated at the facility, and its uninhabitable physical condition, FCI Dublin **is not fit to be**

¹

<https://www.justice.gov/usao-ndca/pr/ninth-and-tenth-fci-dublin-correctional-officers-charged-sexual-abuse-female-inmates>

²

<https://www.justice.gov/usao-ndca/pr/fci-dublin-correctional-officer-sentenced-over-4-years-federal-prison-sexually-abusing>

³

<https://futuroinvestigates.org/investigative-stories/immensely-invisible/immensely-invisible-women-fighting-ices-inaction-on-sexual-abuses/>

reopened in any capacity. BOP made the right choice to close the facility two years ago and now is not the time to reopen it. Given the facility's noxious history, BOP should consider the most obvious option: ***closing and demolishing the facility*** so no future detainees are subject to the abuses endemic to the facility's operation.

Additionally, there is widespread documented history and present-day evidence of the disproportionate abuse that Black migrants face in immigrant detention centers. According to the report, **"Uncovering The Truth: Violence and Abuse Against Black Migrants in Immigration Detention by Black LGBTQIA+ Migrant Project (BLMP), Black Alliance for Just Immigration (BAJI), UndocuBlack Network, and Freedom for Immigrants (FFI)"**,

"Studies show that Black immigrants face a significantly harsher reality inside Immigration and Customs Enforcement (ICE) detention facilities, with increased risks of deportation, higher bond amounts, solitary confinement, physical and emotional abuse, and more. For years, organizations such as Black Alliance for Just Immigration (BAJI), The UndocuBlack Network, Black LGBTQIA+ Migrant Project (BLMP), and Haitian Bridge Alliance have exposed the abusive and disparate treatment of Black migrants. Meanwhile, courageous detained individuals have organized and resisted against egregious abuse by coordinating mass hunger strikes, circulating petitions with their podmates, and demanding accountability and their release from detention. Each act of resistance and exposure has led to greater public awareness and power building inside detention facilities. However, ICE continues to fail in making any structural changes, and the agency continues to operate with near-total impunity from its acts of violence."⁴

Furthermore the report⁵ reviewed nearly 17,000 calls made to the Freedom for Immigrants National Immigration Detention Hotline over a period of six years (January 1, 2016 - December 31, 2021). The data reveals a compelling and disturbing pattern of racism, violence, and harm perpetrated by ICE specifically against Black migrants in immigration detention. Some of these findings include:

- While the population of Black migrants in ICE detention is six percent, 62.8 percent of all abuse-related reports made to the FFI hotline come from Black migrants;
- A new FOIA request corroborates a previous study which found that 24% of all people in solitary confinement are Black;
- In a few facilities in Alabama, Georgia, and Louisiana, Black migrants were almost twice as likely to experience abuse inside detention than other non-Black migrants;
- Black non-binary migrants were 3.5 times more likely to experience abuse in detention;

⁴ <https://baji.org/wp-content/uploads/2022/10/Uncovering-the-Truth.pdf>

⁵ *Id.*

- Over 53% of the most high-intensity and life-threatening cases that Freedom for Immigrants intervened on were on behalf of Black migrants.

There have also been countless community reports about the racialized violence that Black migrants are facing across immigrant detention Centers in California, including segregated housing units and unequal access to basic needs because of their race. This is an extension of chattel slavery and the racialized violence faced by incarcerated Black people (immigrant and non-immigrant) throughout California prisons and jails which led to the closure of FCI Dublin in the first place. This abuse must stop and there must be a concerted effort to **close and demolish** FCI Dublin and stop any future actions of creating and profiting off more prisons, jails, detention centers, concentration camps, psychiatric jails, and any other forms of inhumane and morally-depraved confinement and torture of human beings.

For these reasons, I respectfully urge BOP to:

- Fully analyze what is likely to happen after closure, including vacancy, transfer & reuse;
- Consider the potential impacts of the facility being reopened or repurposed, including as an immigration detention center; and
- Evaluate demolition of the facility, not just closure.

Thank you for the opportunity to submit a comment. If you have any questions, feel free to contact LSPC Supervising Attorney Nnennaya Amuchie at nnennaya@prisonerswithchildren.org.

Thank you,

Paul Briley
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