

# Congress of the United States

Washington, DC 20515

June 1, 2026

Submitted via [bop-adm-facilities-s@bop.gov](mailto: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 on Environmental Assessment for the Proposed Permanent Deactivation and Closure of Federal Correctional Institution Dublin**

Dear Facilities Management Officials:

As elected members of the United States House of Representatives and Senate, we are charged with conducting oversight over the Federal Bureau of Prisons (BOP) and federal properties and facilities. As such, we write to submit formal public comment regarding the BOP Environmental Assessment (EA) concerning the proposed permanent deactivation and closure of Federal Correctional Institution (FCI) Dublin in Dublin, California.

We support the decision to permanently close FCI Dublin and recognize the EA's findings that the property is unsafe, environmentally compromised, and would require substantial public investment to restore it to habitable condition. At the same time, although the EA evaluates the impacts of BOP ceasing operations at the facility, identifying numerous significant environmental hazards and unresolved contamination concerns, it does not sufficiently assess what is reasonably foreseeable to occur after closure, including continued vacancy, transfer, redevelopment, demolition, or repurposing of the site. Nor does it adequately address the environmental and public health implications associated with those potential outcomes.

Given the substantial evidence of contamination, environmental degradation, and unresolved data gaps identified throughout the EA, it would be irresponsible and scientifically unsound for BOP to proceed to a Finding of No Significant Impact (FONSI) without additional environmental review and mitigation planning. Instead, due to previously stated reasons, as well as the long history of staff sexual misconduct at the facility, we support demolishing FCI Dublin. We also strongly oppose any efforts to transfer ownership of the facility to an entity that will utilize it for immigration detention.

We respectfully urge BOP to address the following deficiencies.

### **1. The EA Does Not Adequately Address Recognized Environmental Conditions in the Sanitary Sewer System**

The EA references a 2002 Sanitary Sewer System Evaluation identifying contaminants within the sewer system and deteriorated piping conditions constituting a Recognized Environmental Condition (REC)<sup>1</sup>. However, while the EA states that contaminants will be removed, it does not explain how BOP intends to identify, remediate, contain, or monitor contamination within the sewer infrastructure.

The absence of a remediation plan is particularly concerning given the deteriorated condition of the underlying piping system and the potential for continued environmental release during closure, transfer, or future redevelopment activities. BOP should provide a detailed assessment of the sewer system contamination, including proposed remediation measures, monitoring protocols, and timelines for implementation.

## **2. The EA Fails to Address Ongoing Environmental Risks Associated with Recognized Environmental Conditions at Camp Parks**

The EA acknowledges that Camp Parks contains multiple Controlled Recognized Environmental Conditions (CRECs) associated with decades of military activity, including radiological laboratory operations, fire training areas, underground storage tanks, landfills, fuel spill sites, wash racks, and arsenic disposal areas<sup>2</sup>. However, despite identifying these active contamination concerns and land-use restrictions, the EA does not meaningfully analyze how these environmental hazards will be managed following closure of the facility. Instead, the proposed action discussion appears limited to the handling and removal of routine maintenance materials from FCI Dublin's prison use, such as janitorial supplies, paint, detergents, and similar substances<sup>3</sup>.

The EA's conclusion that closure "is not expected to result in the release of contaminants into the environment" is insufficiently supported given the acknowledged presence of ongoing contamination concerns across the broader Camp Parks property. The EA should include a comprehensive analysis of how BOP will prevent the release, migration, or disturbance of contaminants during closure, vacancy, or any future transfer of the site.

Given the extensive contamination history identified in the EA, BOP should also evaluate demolition and comprehensive remediation of the property as a reasonable alternative.

## **3. Significant Data Gaps Remain Unresolved**

The EA repeatedly acknowledges significant environmental data gaps associated with the historical military use of the property from the 1940s through the 1970s. These unresolved uncertainties raise serious concerns regarding whether the environmental conditions of the site have been adequately characterized. For example, the Environmental Data Report identifies adjoining areas within an unexploded ordnance (UXO) zone associated with Camp Parks<sup>4</sup>. The

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<sup>1</sup> Federal Bureau of Prisons. (2026). ENVIRONMENTAL ASSESSMENT Proposed Action to Permanently Deactivate and Close the Federal Correctional Institution in Dublin, Camp Parks, California (pp. 53)

<sup>2</sup> Ibid.

<sup>3</sup> Ibid., pp. 55

<sup>4</sup> Ibid., pp. 504

EA concedes that it remains unclear whether UXO may also be present on the FCI Dublin property itself. However, the EA does not identify any plan for additional investigation, testing, or remediation related to potential UXO hazards.

Similarly, the EA references historical radiation experiments conducted at Camp Parks between 1958 and 1980, including at least one experiment conducted on land now incorporated into the FCI Dublin property<sup>5</sup>. The record states that “thorough substantiation that adequate testing was conducted must be verified to assure that no radiation hazard exists,” including coordination with the U.S. Army and Nuclear Regulatory Commission. Yet the EA does not document whether any such follow-up investigation or verification occurred.

The EA also identifies two underground storage tanks (USTs) on the property — including a 20,000-gallon diesel UST and a 4,000-gallon diesel UST — while simultaneously acknowledging that the locations and conditions of these tanks remain unknown<sup>6</sup>. These unresolved uncertainties present clear contamination and public health concerns, particularly if future redevelopment activities disturb compromised tanks.

BOP should conduct additional environmental investigation sufficient to resolve these data gaps before proceeding with closure and should publicly disclose the results of those investigations. Given the extensive contamination history identified in the EA, BOP should also evaluate demolition and comprehensive remediation of the facility as a reasonable alternative.

#### **4. The EA Does Not Adequately Address Business Environmental Risks Associated with Future Site Use**

The EA identifies numerous Business Environmental Risks (BERs), including confirmed asbestos, lead-based paint, mold, roof deterioration, and radioactive concerns<sup>7</sup>. The EA further acknowledges that these conditions may create “potential environmental liabilities for future site use and redevelopment.” Despite identifying these substantial hazards, the EA does not sufficiently analyze how closure alone mitigates these risks, nor does it provide a remediation framework for future site conditions. Closure without demolition, remediation, or enforceable long-term management measures risks leaving future occupants, workers, and surrounding communities exposed to hazardous conditions.

At minimum, BOP should evaluate demolition and comprehensive remediation as a reasonable alternative within the NEPA process.

#### **Recommendations**

To ensure that the proposed action complies with NEPA and adequately protects public health and environmental safety, we respectfully urge BOP to:

- Pause the current timeline for issuance of any Finding of No Significant Impact pending additional environmental review;

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<sup>5</sup> Ibid., pp. 1047

<sup>6</sup> Ibid., pp. 504

<sup>7</sup> Ibid., pp. 54

- Conduct further environmental investigation regarding unresolved contamination concerns, including unexploded ordnance, radiological hazards, underground storage tanks, and sewer system contamination;
- Prepare a comprehensive Mitigation Action Plan addressing demolition, remediation, containment, and long-term environmental monitoring;
- Fully analyze reasonably foreseeable post-closure outcomes, including prolonged vacancy, transfer, redevelopment, demolition, or repurposing of the facility;
- Evaluate the potential environmental and community impacts associated with future reuse of the site, including potential conversion to another detention facility or immigration detention center; and
- Evaluate demolition of the facility and full remediation of the property as a reasonable alternative under NEPA.

Thank you for considering these comments. We urge BOP to ensure that any final environmental review meaningfully addresses the substantial contamination concerns and unresolved environmental risks identified throughout the EA before proceeding with closure of the facility, and reiterate our continued opposition to reopening FCI Dublin for any purpose, including to incarcerate people in ICE custody.

Sincerely,



Mark DeSaulnier  
Member of Congress



Zoe Lofgren  
Member of Congress



Alex Padilla  
United States Senator



Adam B. Schiff  
United States Senator



Dave Min  
Member of Congress



Eleanor Holmes Norton  
Member of Congress



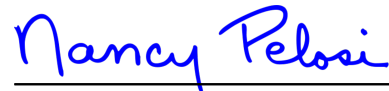
John Garamendi  
Member of Congress



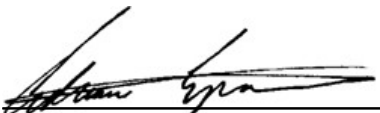
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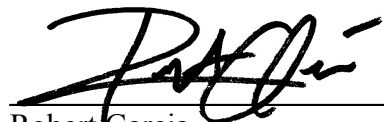
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