



June 30, 2026

VIA email to [ICESustainability@ice.dhs.gov](mailto:ICESustainability@ice.dhs.gov)

RE: Proposed New ICE Detention Site in Hagerstown, MD

To Whom it May Concern:

We are Washington County area community members and elected officials writing to address our urgent concerns about the impact of the DHS detention facility proposed at 16220 Wright Road in Williamsport, Maryland.<sup>1</sup> We live here, work here, and raise our children here. We are deeply invested in our community's landscape, resources and plans because we live with the consequences.

The property at 16220 Wright Road in Williamsport, MD, was conceived of as a warehouse with limited demands on local infrastructure. DHS's plan to convert it into a large-scale detention site for human beings will fundamentally and irrevocably alter our community, including our infrastructure, cultural, historic and environmental resources. It will create enormous burdens that our local community, infrastructure and environment are simply not equipped to handle. We urge government officials in Washington D.C. making landscape-altering plans for our small community to reconsider based on the devastating impacts this will have on the hardworking people who live here today and for generations to come.

**At a minimum, DHS should recognize the significant impacts of its plans on our environment here, and commit to doing an Environmental Impact Statement and a public, transparent process that creates meaningful opportunities for our local community and officials' input—including making comments like this one publicly available. Respectfully, DHS's handling of this matter to date, both here in Maryland and in other jurisdictions across the country, has significantly undermined the agency's credibility in representing and assessing impacts of its detention plans on residents**

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<sup>1</sup> This comment is submitted on behalf of Maryland State Delegate Matt Schindler, Hagerstown City Councilmember Caroline Anderson, Hagerstown City Councilmember Erika Bell, Hagerstown City Councilmember Tiara Burnett, Hagerstown Rapid Response, Washington County NAACP, Washington County Indivisible, and the ACLU of Maryland, all of whom represent or have members who live in the area that will be directly affected by the new detention center.

and communities.<sup>2</sup> DHS is only engaging in this review following court proceedings forcing it to do so and the June 1 scoping notice provides little more information about the government’s plans or proposals, exacerbating our concerns. The notice does not meaningfully answer the most crucial questions about how the warehouse will be modified to be habitable, and does not appear to address or even acknowledge the significant impacts of *operating* the warehouse as a detention center. We do not want our community to be a victim of DHS’s continued pursuit of the goal expressed last year by then-Acting ICE Director Tom Homan to turn ICE’s detention system into something “like Amazon Prime, but with human beings.”<sup>2</sup> DHS bought this warehouse as part of a rushed effort based on political rhetoric and apparent ease of acquisition, rather than long-term planning and consideration of operational realities, as should have been done to drive plans of this scale.

Such rushed plans fail everyone, especially local residents and communities left holding the bag when federal officials are confronted with the realities of their ill-conceived plans. We have seen this across the country, most recently with the closure of “Alligator Alcatraz” in the Florida Everglades following devastating and entirely foreseeable human and environmental impacts and \$1 billion of wasted taxpayer funds later—few of which have been recouped by the State.<sup>3</sup> While federal priorities and strategies may come and go, we local officials and residents live with the fallout.

## **THE VOLUME OF PEOPLE TO BE CHURNED THROUGH DETENTION IS EXTREMELY HIGH RELATIVE TO THE LOCAL POPULATION**

DHS has not provided consistent information about the number of people it intends to hold in detention onsite, nor for how long. Nor has DHS indicated whether it intends to use this detention camp for families and children, in addition to adults. But based on the limited information in the scoping notice and its “Detention Re-engineering Initiative,” DHS intends to operate this warehouse as a massive processing site detaining 1,500 people for 3-7 days before transferring them to another DHS facility or deporting them.

This means DHS will rapidly churn an astonishing number of people through the detention facility: Between 78,000 and 182,500 people each year will be transported in, detained, and transported out. In addition, a large-scale detention center involves significant staffing requirements – correctional officers, administrators, medical providers, security staff, food

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<sup>2</sup> See, e.g., *Maryland v. Mullin* (April 17, 2026) at 2 (“...the Court is left with no doubt that DHS has failed to comply with NEPA. To find proof of this clear failure, one needs to do little more than review a transcript of the Court’s hearing earlier this week at which counsel for Defendants could not answer basic questions about how and why their clients came to the conclusion that a warehouse-to-jail conversion that, even under the most conservative of estimates, is likely to increase Williamsport’s daily population by nearly 50% does not require a more thorough environmental review. Indeed, what review was done appears to have proceeded at a rocket’s pace, and only after Defendants erroneously concluded that the categorical exclusions applied.”), <https://www.courtlistener.com/docket/72313096/43/state-of-maryland-v-mullin/>

<sup>3</sup> <https://www.miamiherald.com/news/politics-government/state-politics/article315981332.html>

and laundry services, and more—but, again DHS has not provided any actual analysis or estimates of the number of people, types of vehicles or other transport that will be involved.

To put this in context, the town of Williamsport is immediately adjacent to the site. Williamsport’s total population is 1,950 people.<sup>8</sup> Hagerstown, the largest city in the area, has a total population of 43,500 people.<sup>9</sup> Washington County’s *entire* population is estimated to be 157,000 people.<sup>10</sup> In other words, over the course of a year, DHS is proposing to detain a total population equivalent to that of the entire county within the detention facility.

### **OUR LOCAL INFRASTRUCTURE AND ENVIRONMENT WILL BE COMPLETELY OVERWHELMED AND PERMANENTLY ALTERED BY THE SCALE OF THIS UNDERTAKING**

A project of this scale and purpose simply cannot avoid impacting local infrastructure in ways that fundamentally affect our community resources and the area environment. As explained by Hagerstown Mayor Bill McIntire, this detention facility “represents a significant and immediate burden on the regional infrastructure.”<sup>4</sup> This new, unexpected burden directly affects our water supply, sewage systems, transportation infrastructure, health and emergency services, all of which affect the region’s environmental and public health resilience.

### **Our Overwhelmed Water Resources Already Represent Our Region’s Greatest Crisis**

We remain concerned that DHS has failed to provide any information about the infrastructure demands needed to renovate and operate this facility, particularly as to water and sewage. But even without this information it is obvious, as Hagerstown’s Mayor has explained, that “[a] facility of this size will stretch our water resources because of our anticipation of future economic growth here. This is not a political statement. It is an engineering reality.”<sup>5</sup>

Indeed, we cannot emphasize enough how fundamental and longstanding these concerns have been for local residents and how important it is to our long-term health as a community to resolve them in a coherent, well-planned manner. As explained by a local news article,

Ask anyone involved in Washington County’s water and sewer debate what they want, and the answer is remarkably consistent. Commission President John Barr wants an aggressive, intelligent plan for water for everyone. Mayor Bill McIntire wants a conversation between city and county about teaming up on solutions. City Administrator Scott Nicewarner says the two sides could

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<sup>4</sup><https://tristatealert.com/hear-from-the-stakeholders-themselves-this-is-the-roundtable-discussion-on-the-washington-county-processing-center-that-happened-this-afternoon/>

<sup>5</sup> *Id.*

get a lot more done together than separately. County government says it recognizes the city as an important regional partner.

Nobody disagrees on the goal. What two decades of history shows is that getting from that goal to an actual shared plan is far harder than anyone has yet managed [...] ...

The region's water and sewer infrastructure is aging. Capacity constraints documented in 2006 are arriving on schedule. Regulatory requirements are tightening. The need is real and the urgency is legitimate on all sides.<sup>6</sup>

In recent months, our local officials have initiated studies to assess need, capacity and develop master plans that will serve community at the city and county levels. DHS's sudden new proposal to vastly increase demand on these systems threatens to undermine these local efforts and the region's long term water resources.

We are especially concerned about the lack of information about drinking water and sewage disposal, which create some of the most immediate risks to our public health and safety, in addition to new taxpayer expense. Indeed, even Florida Governor DeSantis, who has championed the massive expansion of detention facilities in that state, has acknowledged the extensive costs to the state and local communities that will not be reimbursed in relation to the ICE facility there—specifically “noting the high sanitation costs to shuttle human waste” away from the site as a significant expense.<sup>7</sup> The failure to adequately plan and consider impacts *before* committing to the site also led to dangerous conditions for the health and safety of those living and working at the site, in addition to the damaging environmental impacts.<sup>8</sup>

### **Anticipated Sewage Demands Far Exceed Existing Capacity**

Thus far, only Maryland state officials, rather than DHS, have provided concrete projections to help us understand the new potential demands on our community infrastructure. In *Maryland v. Mullins*, the U.S. District Court of Maryland received detailed declarations from state officials who analyzed water and wastewater usage based on nationally-accepted standard projections, as well as *actual* use at state-operated correctional facilities in Maryland. **State officials estimate that DHS's plans to use the warehouse as a detention**

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<sup>6</sup> <https://www.tristatealert.com/everyone-agrees-washington-county-has-a-water-problem-agreeing-on-the-solution-is-another-matter>.

<sup>7</sup> <https://www.miamiherald.com/news/politics-government/state-politics/article315981332.html>

<sup>8</sup> There has been extensive documentation and reporting of these harms. See, e.g., <https://www.amnesty.org/en/latest/news/2025/12/estados-unidos-nuevas-investigaciones-revelan-violaciones-de-derechos-humanos-en-los-centros-de-detencion-de-alligator-alcatraz-y-krome-en-florida/>

site for 1,500 people per day will generate between 187,500 and 357,675 gallons of wastewater flow each day—the equivalent of adding between 750 and 1430 new homes to the area sewage system.<sup>9</sup>

The Wright Road Pumping Station, which serves the site, can handle a maximum of 102,240 gallons per day. It “receives an average of 77,498 gallons per day (about 76% of capacity) of wastewater. This leaves only 24,742 gallons per day of available capacity.”<sup>10</sup> Further, the existing sewer lines are simply too small to handle the additional flow of even half the estimated need.

Using common sense, neither the pumping station nor the existing sewer lines could adequately handle this capacity. **Without significant excavations and modifications to the pumping station and sewer lines, disastrous sewage failures are guaranteed. Overloading the sewage system can result in dangerous release of fecal matter and other human waste carrying bacteria like Salmonella and E.coli into homes, businesses, surfaces and waterways like Semple Run.** Indeed, we need not look far to see the significant consequences when sewer systems fail or are overloaded. Earlier this year, a collapsed sewer line spilled millions of gallons of raw sewage into the Potomac, causing historic damage. Two years ago, unexpectedly heavy rains in the central Maryland region combined with aging pipes allowed stormwater to infiltrate sewer systems, causing multiple simultaneous overflows and dumping millions of gallons of sewage in Baltimore streams.

### **Anticipated Water Demands Will Further Burden our Already Strained Water Supply and Aging Water Infrastructure**

We are equally concerned that the DHS scoping notice fails to meaningfully acknowledge or address the significant increased need for water and its impacts on the region’s 100-year-old water treatment plant and water mains. Last year, Hagerstown’s City Administrator observed that “[t]here’s no bigger issue” in the region than its strained water supply and aging water infrastructure.”<sup>11</sup> This statement should cause DHS pause, as the City of Hagerstown supplies water for most of the region, including the detention site.

The City has yet to receive any basic information or direct notice from DHS about the massive increase in water use from its current allocation of 800 gallons of water per day. As DHS has failed to provide estimated water needs, we refer to the detailed estimates provided by the

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<sup>9</sup> Exhibit M, Second Declaration of Walid Saffouri, in *Maryland v. Mullin*, at p. 6-7, <https://www.courtlistener.com/docket/72313096/15/16/state-of-maryland-v-mullin/>

<sup>10</sup> *Id.*

<sup>11</sup><https://www.heraldmillmedia.com/story/news/local/2023/04/28/hagerstown-and-washington-countymeet-to-plan-areas-water-needs-maryland-utilities-budgeting/70158985007/>

State, which indicate a range of between 187,500 to 311,348 gallons of water per day.<sup>12</sup> Even at the lowest end of this range, this increase raises major concerns unaddressed by the scoping notice. The City’s water treatment plant was built in 1928 and is badly in need of repair. According to a recent government assessment, its “primary lines are fragile and too small to handle increased volumes of water,” and other distribution lines can’t handle more flow because they are “operating at maximum pressure.”<sup>13</sup>

Of great concern to local residents who rely on this drinking water, the City has an extremely limited backup water supply in the event the 100-year-old water plant or its other aging infrastructure breaks down. *The back up water supply is equivalent to less than one day of existing usage.*

We already have significant issues with our water supply and we do not want to be the next Flint, Michigan. Even now, we live with the consequences of our badly-outdated water system, which results in water outages, main breaks and other impacts that affect our quality of life. Any basic internet search for water issues in the area demonstrates what those of us who live here know -- that our local infrastructure is already distressed. For example, in September 2024, a major water main break flooded out a major roadway and left a huge chunk of the region completely without water.<sup>14</sup> Even after water service was restored, local residents were urged to conserve water indefinitely. A few months later, a different water main break forced the closure of East Antietam Street in Hagerstown, and two months later a water main break on Pennsylvania Avenue again resulted in residents left without water. Our local officials face enough challenges managing our aged infrastructure without adding sudden large additional burdens.

## **DHS OWES RESIDENTS TRANSPARENCY, RELIABLE INFORMATION AND MEANINGFUL EXPLANATIONS**

The scoping notice does not describe basic parameters of DHS operations at the site, such as proposed lengths of stay, staffing levels, or even estimated water and wastewater needs. As has been the case throughout this undertaking, the lack of basic information from DHS stymies meaningful input. For example, the scoping notice states that “A Wastewater & Domestic Water Infrastructure Assessment was conducted,” but does not describe in any way how or even what estimates about water use and sewage flow were provided to assessors. Rather, the notice provides only generic “possible” contemplated work, leaving residents without any clear notice of what is being considered, its potential risks and impacts, nor alternate options.

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<sup>12</sup> Exhibit M, Second Declaration of Walid Saffouri, at 10-11.

<sup>13</sup><https://www.heraldmillmedia.com/story/news/local/2023/04/28/hagerstown-and-washington-countymeet-to-plan-areas-water-needs-maryland-utilities-budgeting/70158985007/>

<sup>14</sup> <https://www.washco-md.net/news/substantial-water-main-break-on-virginia-avenue-near-i-70-overpass/>

**The notice lists potential actions so vaguely that it is impossible to tell what DHS is actually proposing with respect to the project’s most significant impacts on our community infrastructure and environment. How can DHS meaningfully assess environmental impact on this basis? The notice does not distinguish between which potential modifications pertain to water supply and which pertain to wastewater, nor even commit that the modifications listed represent the complete universe of options DHS is contemplating. See DHS scoping notice at 2 (“Some modifications may include ...”). Indeed, the only information in the scoping notice about how DHS intends to resolve the massive increase in need for water is a proposed large on-site storage tank (which, based on estimates, would hold about a 2-4 day water supply) and “upsizing” water lines. The scoping notice does not indicate how it will source this massive increase, leaving us to presume that DHS will rely on our limited local water supply. **Whether DHS’s silence on the water supply is based on a preference for secrecy or some kind of failure to recognize how crucial this is to our community, the upshot is the same: the hardworking taxpayers and residents of this community deserve better.****

As Hagerstown Rapid Response explained in a recent public message:

Local infrastructure is already serving homes, schools, and small businesses under real constraints. There is no hidden surplus capacity waiting to absorb a project of this magnitude. Every additional demand placed on the system forces tradeoffs somewhere else.

That is the part that often gets lost in official language. Capacity is not flexible just because it is discussed in planning documents. It is physical. Pipes carry only so much. Treatment plants process only so much. Pump stations move only so much. And once that limit is reached, something else gives.

And when systems are pushed past their intended range, the costs do not disappear. They shift downward into long-term maintenance, emergency repairs, and accelerated infrastructure upgrades that local ratepayers are left to cover. The federal government does not carry those costs over time, and private contractors have no stake in what happens after construction is complete.

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Our comments are not intended to be comprehensive—they can’t be at this stage, when we still have so little information about what DHS is planning to do here in our community, and how. We reiterate: As local officials representing this community and as local members of the community, we deserve high-quality, reliable information and the opportunity to shape what is happening here. We have yet to see that.

We urge DHS to recognize the significant environmental impacts of its plans to operate a large-scale detention center in our small community, and to commit to an Environmental Impact Statement and a public, transparent process with meaningful opportunities for our local community's input. We need to be able to plan for our future here in Washington County regardless of which way the political winds are blowing in Washington, D.C.