WATERSHED FAITH

Detention Center Accountability

Preaching Toolkit

A resource for faith leaders confronting immigration detention

Watershed Faith — The Mainline Protestant Stream

Where faith gathers to reimagine the common good

Welcome

We are at an unprecedented moment in our national consciousness. While some of the major pushes by Immigration and Customs Enforcement in cities like Los Angeles, the District of Columbia, Chicago, Minneapolis, New Orleans, and Charlotte have abated, ICE is regularly setting new daily records for arrests and detention. Just because the crisis has receded from our newsreels does not mean that we are not facing a moral and spiritual emergency. In fact, it's poised to get worse from here. ICE is guaranteed nearly unlimited funding through the end of the Trump administration, and they have undertaken a huge push to expand facilities, including those that detain children.

This toolkit responds to this crisis. We need faith leaders, both clergy and lay, to engage with what might be the most pressing issue of our generation and work to redeem this country. In its pages, you will find entry points for preaching and leading conversations about detention centers from a faith-based perspective. In addition to learning how detention centers operate in the United States and reviewing sample sermons, the last section invites you to consider ways your local coalitions might detention-center-proof your city, county, or other local government.

Crucially, this is only the beginning. On February 14th, we hope you will use this toolkit in your preaching. We also hope you will join us in planning events that highlight faith-based resistance to detention centers across the country. While it is crucial that faith leaders use their words to defend human dignity, it is also essential that we back those words up with actions. To that end, our first action will be gathering people to host vigils in front of ICE hold rooms (more on that below) the week of December 14th, with more actions to come.

Week of December 14

Host vigils in front of ICE hold rooms in communities across the country.

February 14

Use this toolkit in your preaching and join faith-based resistance events nationwide.

Questions or organizing opportunities

Reach out to Michael Woolf, the creator of this toolkit, at mwoolf@watershed.faith.

Detention Centers in Four Numbers

65,765
people held in ICE detention

70.6%
had no criminal conviction

$45 billion
in added funding to expand detention through September 2029

2,698
agreements with state and local law enforcement under the 287(g) program

Sources

As of July 11, 2026, ICE held 65,765 people in detention; 46,436 (70.6%) had no criminal conviction. Source: TRAC Immigration Detention Quick Facts.

$45 billion in additional funding to expand immigration detention through September 2029. Source: American Immigration Council, July 2025 analysis of H.R. 1.

As of October 20, 2026, ICE had 2,698 agreements with state and local law enforcement under its 287(g) program. Source: The Philadelphia Inquirer, November 5, 2026.

1. What is immigration detention?

Unlike imprisonment following a criminal conviction, immigration detention is generally civil detention, not criminal punishment. Many people held in immigration detention have never been convicted of a crime. Some are seeking asylum, others have lived in the United States for years or decades, and some are contesting deportation orders or other immigration decisions.

People may be held in dedicated immigration detention centers, county jails, private prisons, repurposed correctional facilities, or temporary holding facilities. Detention can last from days to months or, in some cases, considerably longer.

As of July 11, 2026

Approximately **71%** of people held by ICE had no criminal conviction. Almost **40%** had neither a conviction nor pending criminal charges.

These distinctions matter because immigration detention is frequently presented as a system for incarcerating dangerous criminals. In reality, it is not. The majority of those detained and deported are not criminals, and immigration law permits detention for reasons unrelated to criminal conviction, a reality that this administration has been eager to exploit.

2. An unprecedented expansion of detention

The United States operates the world's largest immigration detention system. During fiscal year 2025, more than 310,000 people passed through immigration detention.

Detention expanded rapidly beginning in January 2025. According to the Government Accountability Office (GAO), the average daily ICE detention population increased from 39,314 on January 20, 2025, to 67,204 on April 1, 2026 — an increase of 71%. The number of authorized ICE detention facilities grew from 134 to 239 during the same period.

Substantial federal funding has supported this growth. Legislation enacted in July 2025 provided approximately $45 billion to expand detention capacity through fiscal year 2029, essentially freeing ICE from needing Congress's support until the end of the Trump administration.

Expansion has included reopening previously closed prisons, contracting with county jails, establishing new detention centers, using military installations, and purchasing warehouses for possible conversion into large-scale detention facilities.

One especially prominent example is Camp East Montana, established at Fort Bliss in El Paso, Texas, in August 2025. The facility was designed to hold about 5,000 people. A June 2026 GAO investigation found problems with construction speed, contract administration, spending, and compliance with detention standards.

The federal government has also pursued warehouse conversions. A September 2026 GAO report found that ICE purchased 11 warehouses for approximately $1.07 billion but later planned to sell seven. The GAO criticized the absence of comprehensive planning and identified millions of dollars in unrecoverable expenditures.

This expansion means that immigration detention is no longer confined to a relatively small number of familiar facilities. It is an increasingly extensive network that can reach into communities far from the southern border.

3. Private corporations and the business of detention

A major feature of the American immigration detention system is its reliance on private corporations.

Companies such as The GEO Group and CoreCivic operate detention facilities under government contracts. Other businesses provide security, transportation, food services, medical care, and facility management.

According to the Prison Policy Initiative, private prison and detention companies received an estimated $2.4 billion in revenue from ICE detention during 2025. The GEO Group and CoreCivic accounted for most of this revenue.

Private detention raises questions about the relationship between financial incentives and human dignity. Companies are compensated through contractual arrangements that can include payments connected to facility availability, capacity, or the number of people detained. Critics argue that these arrangements create strong financial incentives to detain more people and maintain detention capacity. They also create an incentive for companies to cut costs by reducing spending on food, health care, adequate staffing, and other operating costs, leading to inhumane conditions that would not be allowed in jails and prisons. Companies and government agencies, meanwhile, maintain that contracted facilities provide needed capacity under federal standards and oversight.

It is important to distinguish ownership from operation: some detention centers are owned by government agencies but operated by private contractors, while others are privately owned. Some contracts also pass through state or local governments.

For churches, the practical question is not only where detention centers are located, but also which public and private institutions are responsible for what happens inside them.

4. How 287(g) agreements extend immigration enforcement into local communities

Immigration enforcement is not carried out exclusively by federal officers.

Section 287(g) of the Immigration and Nationality Act permits ICE to enter into agreements with state and local law enforcement agencies, delegating certain immigration enforcement functions to trained officers under federal supervision.

As of October 20, 2026, ICE reported **2,698 active 287(g) agreements** across 38 states and two U.S. territories.

There are three principal models:

Model	What it permits
Jail Enforcement Model	Designated local officers can identify and process certain people already in jail for immigration enforcement.
Warrant Service Officer Model	Designated officers can execute ICE administrative immigration warrants within their detention facilities.
Task Force Model	Designated officers can exercise specified immigration enforcement powers during routine policing or ICE-led operations.

These agreements connect local policing and detention to federal immigration enforcement. For example, thousands of people have been stopped by local police for a simple traffic violation and have been subsequently detained and deported.

For congregations, 287(g) is especially important because participating agencies can include county sheriffs, municipal police departments, and other institutions that are accountable to local communities.

5. Conditions inside detention centers

Investigations by journalists, medical professionals, government inspectors, and human rights organizations have documented serious problems in portions of the immigration detention system.

Reported concerns include overcrowding, inadequate medical and mental health care, delayed access to medication, poor sanitation, insufficient access to legal assistance, isolation, and restrictions on communication with family members.

In May 2026, the California Department of Justice reported that conditions in the seven immigration detention facilities it inspected in 2025 had largely deteriorated amid rising populations, particularly regarding medical care and conditions of confinement.

Deaths in immigration detention are an especially serious concern. Human Rights Watch documented 52 deaths in ICE custody between January 20, 2025, and June 4, 2026, and found that the detention mortality rate had risen to its highest level in nearly two decades.

6. Child and family detention

Immigration detention also affects children and families.

The South Texas Family Residential Center in Dilley, Texas, reopened for family detention in 2025. Reports in 2026 documented children being held for extended periods and raised concerns about food, medical treatment, emotional distress, and access to appropriate services.

Far from backing away from children and family detention, the Trump administration is striving to make it a cornerstone of its immigration policy. A new facility in Alexandria, LA, is set to open, where, for the first time, unaccompanied minors will be imprisoned.

Free Families: The National Coalition to End Family and Child Detention

Excellent resources on the profound impact on children are available on the Free Families website.

7. ICE holding rooms for children

There is one, and soon to be a second, ICE detention center for children and families in the country: in Dilley, Texas, and in Alexandria, Louisiana. Before children are sent to one of these detention centers, they are detained in ICE hold rooms in many communities around the country. There are more than 100 of these around the country. We created a map showing where these hold rooms are located, with exact addresses and how many children were detained there during a 10-month period in 2025 for which we have data.

This information comes from ICE records obtained through the Freedom of Information Act and analyzed by the Deportation Data Project, Colorado Times Recorder, and No Concentration Camps Colorado.

The ICE hold rooms map

View the ICE hold rooms map. Note that addresses are the locations researchers associated with the corresponding ICE facility codes. Because ICE operations can move, reconfirm an address independently before assuming it is still in use. These are not current population counts. This is the most recent data we have, and we are working to get more up-to-date data for 2026.

The existence of this network of places where children are imprisoned is important in our organizing work, because it highlights the inhumanity right in our own communities, not just in two remote facilities in rural Texas and Louisiana. During that one 10-month period in 2025 for which we have data, 100 of our precious children were held in downtown Los Angeles; for example, 33 were held in Atlanta, 37 in Orlando, and 17 in Buffalo. Very few

people, even the most involved activists, have known about children being detained in their communities. We now have the opportunity to shine a light locally on this piece of the deportation machine and demand that it be shut down. These ICE hold rooms could be the location of vigils, public action, and perhaps calls for an end to innocent children being locked up.

Key Points of Entry for Congregations

While detention centers are a core concern for people of faith, there are a few entry points for sermons and discussions that provide a grounding that can be helpful in helping congregations see why these issues are not just political — they strike at the very core of what it means to be a Christian in this moment. What follows is a brief outline of how messages might be crafted around these concerns, with a sample sermon on one of them that can be helpful as you craft your message.

In addition to the three categories that are listed below, we hope that you use the above information to create your own entry points. Certainly, one could preach about the business of detention centers and greed, the expansion of detention as opposed to the expansion of compassion, or the way that moral injury occurs from these events of cruelty — both in those who are victims and perpetrators and those of us who witness it from our screens. All are worthy, and there are likely dozens more important points to consider. Here are three that we'd like you to consider:

Religious rights for detainees

One of the more difficult aspects of ministry in these times is that detention centers make it hard to minister to those in detention. While an authorization process exists, many detention centers have denied access to local clergy who are seeking to help detainees access their rights to spiritual care. Across the country, lawsuits have been filed to gain access to these facilities, with many successful. Ministry in detention centers is an important witness to the inherent human dignity of those who are detained, and it also has several practical benefits. Clergy who visit detainees can note the conditions in detention centers and whether medical or other care is being denied, in addition to attending to detainees' spiritual needs.

For Christians, ministering to those who are imprisoned is not an ancillary activity, but one of the core ways that we are called to act on our faith. Matthew 25:31-46 imagines a conversation in which Jesus speaks with believers who did or did not visit the imprisoned and the sick, and uses our actions to judge whether we are truly his followers. So what are we supposed to do when the state makes it impossible to live out our commitment to the Gospel? Such questions have to be at the heart of our faith, and ought to lead us to question why the Department of Homeland Security is spending so much time trying to

make it difficult for detainees to be treated like human beings.

Preachers may consider highlighting the relationship between church and state, or suggesting one concrete action the congregation can take to increase access to detention centers. Whether that is a letter-writing campaign, a vigil in front of a detention center, or a prayer service, these actions not only challenge dehumanization but also build congregants' capacity to act on their faith.

Child and family detention

One of the more shocking aspects of this current administration's push to detain individuals is its reliance on the cruel tactic of detaining children and families, one that was a focus of news attention during the first Trump administration, although cruel practices also happened before the Trump administration, including in the Obama and Biden administrations. During the second Trump administration, the White House has not stepped back from its use of child and family detention, instead expanding its use to include unaccompanied minors, with a plan to house them at the new facility in Alexandria, LA.

In crafting your message, you might choose to focus on Matthew 19:13-15, where Jesus says, "Let the children come to me, and do not stop them, for it is to such as these that the kingdom of heaven belongs." Alternatively, a good set of verses is Matthew 18:3 and 18:6, where Jesus instructs us to become like children so that we might enter into the kingdom of heaven and later says that "it would be better for you if a great millstone were fastened around your neck and you were drowned in the depth of the sea" if one causes them to sin. It seems that Jesus held children in high regard and sought to care for them.

What does it say about our society that the stated policy of our government is to imprison children who are not guilty of any crime? Young children are routinely expected to defend themselves in deportation proceedings without access to a lawyer. Surely, such a society is on the wrong path, and ought to be corrected. How a society treats the defenseless, especially children, is an indicator of its moral standing, and our faith has to be used to defend children and redeem this country.

Another entry point for your congregation could be the reality of ICE hold rooms where children are detained before being sent to Dilley in Texas or another facility. While not everyone is within driving distance of a detention center, these hold rooms dot our country's landscape and may offer opportunities for action through a vigil, prayer service, or other efforts.

Conditions in detention centers

Most of those who find themselves in detention centers have committed no crime — immigration offenses are civil. Yet, they often find themselves in deplorable conditions, a tactic that is often utilized to push detainees to waive their rights and self-deport. At Broadview ICE Processing Center in Illinois, a federal judge compared conditions to Nazi

concentration camps. Overcrowding, unsanitary conditions, as well as lack of access to medical care, legal representation, and spiritual care are all issues that plague these facilities.

It is crucial that our faith be used to proclaim the inherent dignity of all people. Genesis 1:26-27 outlines how God created all human beings in God's own image. Human history is full of attempts to create a hierarchy of importance among human beings, but scripture's witness is resolute—we are all beloved of God.

Proclaiming that belovedness and the *imago dei* is more important than ever. That's because this administration has pushed dehumanizing narratives that seek to strip the dignity of those it has detained. As Christians, we must use every tool at our disposal to proclaim that dignity against forces that seek to diminish it.

Sample Sermon

O Lord, how long shall I cry for help,
and you will not listen?
Or cry to you "Violence!"
and you will not save?
Why do you make me see wrongdoing
and look at trouble?
Destruction and violence are before me;
strife and contention arise.
So the law becomes slack,
and justice never prevails.
The wicked surround the righteous;
therefore judgment comes forth perverted.

Habakkuk 1:2–4 (NRSVue)

13 *Then children were being brought to him in order that he might lay his hands on them and pray. The disciples spoke sternly to those who brought them,* **14** *but Jesus said, "Let the children come to me, and do not stop them, for it is to such as these that the kingdom of heaven belongs."* **15** *And he laid his hands on them and went on his way.*

Matthew 19:13–15 (NRSVue)

Scripture quotations are taken from the New Revised Standard Version Updated Edition. Copyright © 2021 National Council of the Churches of Christ in the United States of America. Used by permission. All rights reserved worldwide.

In Warsan Shire's poem, "What They Did Yesterday Afternoon," she imagines running her fingers over an atlas of the world and asking, "where does it hurt?" The atlas responds, "everywhere, everywhere, everywhere." That seems accurate to me, and in this sermon I want to put my finger on one particular place on that atlas and witness the pain there.

Lucy approached the lawyer's bench in a floral dress. When she was seated in the courtroom chair to give testimony, she needed help getting there. A lawyer from a nonprofit gave her a teddy bear but could not represent her in the proceedings. She is three years old, and she was forced to represent herself in deportation proceedings in a Tucson courtroom. This is part of a new push of cruelty from the Trump administration, where unaccompanied migrants are not given access to lawyers to defend themselves. She was one of 25 children in court that day in Tucson. (Source for Lucy's story: Copper

Courier)

The detainment of children is one of the hallmarks of Trump's first administration, and it drew a lot of attention. Perhaps because of ICE's actions in places like DC, LA, Chicago, and Minneapolis, and the violence that was perpetrated there, it has received less attention during this administration. According to a recent report about children's detention, "5,600 people, including parents, children, toddlers, and newborn babies, have been imprisoned at Dilley between April 2025 and February 2026. A new facility is opening in Alexandria, LA, that is meant to hold children and families. These children, of course, have committed no crime, as immigration violations are civil in nature. Even if they had, a prison is no place for a child.

It seems like reading an excerpt from Kafka's *The Trial* to think that a child like Lucy could defend herself in court. It is a legal fiction that is used to cover up the gross injustice of what is happening to those who come to our country seeking stability and a better life.

Jesus seems to have had a special fondness for children. Although he was not a traditional family man himself, he tells his disciples in Matthew 18:3 that they must become like children to enter the kingdom of heaven. He blesses them and admonishes his disciples when they keep the children from approaching him in our scripture reading this morning. It seems that Jesus, like our broader culture, sees children as sacrosanct. We do our best to protect children from harm, even if we don't know them personally.

I'll never forget being a kid lost in a Walmart when I was six years old. I wandered around trying to find my family for what seemed like forever until someone asked if I was lost and helped me find them. They didn't know me from Adam, and yet they saw a child who needed help. It is part of our natural instinct to care for children. And yet, as a society, we are locking children away in detention centers and forcing them to represent themselves in court proceedings.

That detention promises to do lasting harm to children. According to that same report, a guard in Dilley repeatedly told a child that if he didn't listen to his mother, he would be taken and given to a new family. A breastfeeding mother was detained and separated from her newborn baby while breastfeeding for over 100 days. These are just a couple of examples of the type of casual cruelty visited upon people who are detained in places like Dilley.

This administration would tell you themselves that the cruelty is the point of the entire thing. By creating what they would term "adverse conditions," they hope to dissuade people from petitioning for asylum or entering the country without proper identification. But the question that we must wrestle with is: what is the cost of such a policy? I don't mean dollars and cents; I mean the moral cost. What does it do to our souls when cruelty becomes U.S. policy?

We often have this sense that ancient people, like the folks in the Bible, were simpler than we are. That they did not face the same sorts of problems. And in one sense that might be correct — they did not have to contend with algorithms or artificial intelligence — but mostly that's wrong. When we open scripture we find people wrestling with what it means to live in a country where the courts pervert justice as opposed to delivering it. We find them wrestling with what that casual cruelty does to the human spirit.

Crucially, the Bible tells us that sin is not just a personal affair. It is systemic. That is the very definition of what Christianity has taught about original sin — that we are born into systems of sin that we did not create but that we nevertheless participate in and benefit from, even if against our will. That is not a question of guilt, but it is one of accountability. We have tasks that we must attend to if we are to be gathered in Christ's name, as these sins are perpetuated in our name — allegedly to make this country safer or better, when we know that is not the case.

The truth is that the Bible has always proclaimed that all human beings have inherent dignity that must be defended. Right there from the beginning in Genesis, we see that each of us is made in the image of God. There have been many attempts throughout history to dismiss this fundamental equality and belovedness, but it stands as a bright light in our tradition. We must never concede it to those who would seek to rob the dignity of others. That means proclaiming it, not just in churches, but in public. When children are locked in detention centers, it is not just unnamed individuals; it is people like Lucy, people who are the beloved of God.

More than that, Matthew 25 tells us that those who are locked in prison are Jesus himself. What we choose to do for them, or choose not to do, is what we do or withhold from Jesus. That is a high bar, and I think it was put there in scripture for a reason — for these times, to make our moral conscience and task before us crystal clear. This is the beating heart of our tradition, and whether we live up to its expectations is up to us.

It can sometimes feel like what we do doesn't matter much. Whether we stand against what is happening at Dilley and soon-to-be Alexandria, LA is likely to continue whether or not we mobilize as a congregation, talk about it in worship, or proclaim the dignity of human beings. But it does matter. It matters to God and to the folks we choose to be in solidarity with. It matters because it is also about acting with whatever tools we have at our disposal. What we do counts for something, and faith-based voices are such an important part of standing up for folks like Lucy. She has no legal representation, but does she find representation in our worship and in our hearts, in our actions in the world? In our prayers that we lift up before God?

The answer to that question matters deeply. Christianity does not promise a social revolution, and as Martin Buber puts it, "success is not a name for God." But it does promise a revolution of the heart, and those individual revolutions can build a change in our society's spirit. That revolution starts right here, right now, and with us.

Dorothee Soelle says that we are the only hands that God has in the world. What we do either enlarges God's reach or diminishes it. As we go out into this world to make it better, let's try to make God's reach just a little bit longer. Let's make sure that it reaches people like Lucy, and the countless children bearing the brunt of cruelty of this administration. If we do so, I promise that it matters, matters more than anything.

Detention-Proof Your Town: Act Before ICE Comes Calling

A proactive organizing guide for congregations, community groups, and local leaders

The best time to prevent an immigration detention center from opening in your community is before a site is identified, a building is purchased, or a contract is signed.

Communities across the United States are learning that decisions about immigration detention are not made exclusively in Washington. Local governments, planning commissions, fire departments, water authorities, and property owners may all play a role in determining whether a proposed facility can operate safely and lawfully.

The growing movement against large-scale data centers offers a useful model. Residents have successfully organized around infrastructure capacity, environmental protections, zoning, and the costs that industrial developments impose on local communities.

Some of these strategies also apply to immigration detention facilities. In fact, several communities have already demonstrated their potential by successfully blocking new facilities from getting built.

The goal is to build local relationships, establish protections, and prepare public institutions before federal detention expansion reaches your community.

1. Begin with local elected officials

Contact your mayor, city council members, county commissioners, and planning commission members. Do not wait until an immigration detention facility is proposed.

Ask for a meeting to discuss whether your community has safeguards against building or converting facilities into detention centers.

Questions to ask:

- Does our zoning code specifically address detention and correctional facilities?
- Could an existing warehouse or industrial building be converted into a detention center without a public hearing?
- Would a change in building use require new permits or approvals?
- Could the local government adopt a temporary moratorium on new detention facilities while examining their impact?
- What advance public notice would residents receive about a proposed facility?
- Would elected officials commit to a transparent public review process?

What to advocate for

A review of existing land-use regulations, public notice requirements, and the possibility of a legally defensible moratorium or special-use permit process.

A real-world example: Kansas City, Missouri. In January 2026, Kansas City adopted a five-year moratorium on local approvals for nonmunicipal detention facilities. The ordinance covered building permits, zoning applications, special-use permits, and other municipal approvals. In April, the city adopted a further ordinance addressing detention facility approvals. The measures were responses to the possibility of an enormous ICE detention center in the area. (kcmo.gov)

Learning from data centers: Communities confronting proposed data centers have persuaded local governments to pause development while studying its consequences. Columbia Law School identifies temporary, clearly justified moratoria as one tool available to municipalities, subject to state law. (Columbia Law Blogs)

The federal government may be exempt from some local zoning and building requirements. Municipal restrictions are generally more legally vulnerable when applied to federally owned property than to private development. Any proposed ordinance should be reviewed by attorneys familiar with federal preemption and local land-use law. (Wisconsin Democracy Initiative)

2. Meet with your local fire department

Fire departments are important partners because buildings designed for storage or industrial activity are not necessarily suitable for housing hundreds or thousands of people.

A warehouse converted into a detention center raises questions about evacuation, fire suppression, emergency access, and the safety of people who cannot independently leave a locked facility.

Schedule a meeting with your fire chief, fire marshal, or local emergency management director.

Questions to ask:

- What fire-safety requirements would apply if a warehouse were converted into a detention facility?
- Would the change in occupancy require additional fire protection systems?
- Can existing access roads accommodate emergency vehicles?
- How would firefighters evacuate hundreds or thousands of people held behind locked doors?

- Does the department have sufficient equipment and personnel to respond to a large-scale emergency?
- Who would pay for additional staffing, equipment, and training?
- Would the department have authority to inspect the facility? If not, how would fire safety be independently verified?

What to advocate for

A formal assessment of the emergency-service implications of converting warehouses or other large buildings into residential detention facilities.

Learning from data centers: Columbiana, Alabama, adopted a data-center ordinance in February 2026 requiring emergency response plans, fire department review, evaluation of emergency vehicle access, and appropriate firefighter training. This illustrates how communities can require public-safety assessments before approving major developments. (eCode360)

For detention facilities, an additional concern is paramount: People held in detention cannot simply evacuate a burning building on their own.

3. Meet with your local water and wastewater authorities

Water supply and wastewater treatment capacity have become important issues in debates over both data centers and detention facilities.

A detention center housing thousands of people needs dependable drinking water, toilets, showers, laundry facilities, food preparation, and wastewater disposal.

These demands can substantially exceed those of a warehouse used for storage.

Contact your municipal water department, sewer district, water utility board, or regional water authority.

Questions to ask:

- How much additional water could our community supply without affecting existing customers?
- What would happen if a warehouse began housing 1,500, 3,000, or 10,000 people?
- Could the existing wastewater treatment system handle the additional demand?
- Would upgrades to water mains, sewer lines, or treatment facilities be necessary?
- Who would pay for those upgrades?
- What permits or infrastructure agreements would be needed?
- Can the water authority require a capacity assessment before committing service to a major new development?

What to advocate for

Clear, publicly available standards requiring major proposed developments to demonstrate adequate water and wastewater capacity, with applicable costs and responsibilities established in advance.

A real-world example: Pennsylvania. In July 2026, the Pennsylvania Department of Environmental Protection announced that two proposed ICE detention facilities in Berks and Schuylkill counties would not proceed. State officials had challenged the projects because of inadequate drinking-water and wastewater infrastructure. Pennsylvania issued administrative orders preventing the proposed uses of water and sewer systems unless they met environmental requirements. DHS subsequently withdrew its appeals and confirmed that the warehouses would not be used as detention centers. (Pennsylvania.gov)

Learning from data centers: Linn County, Iowa, required proposed large-scale data centers to conduct water studies, demonstrate adequate supply, and enter agreements addressing water use. The county subsequently imposed an 18-month moratorium in July 2026 to evaluate whether its regulations adequately protected public infrastructure. (linncountyiowa.gov)

Communities do not need to wait for a detention proposal to begin examining the capacity and public accountability of their water infrastructure.

4. Engage local planning and building officials

Some detention expansion projects involve purchasing existing warehouses rather than constructing new buildings.

This makes advance review of local industrial properties particularly important.

Ask your planning department to explain what processes govern changes in use for large warehouses and other commercial buildings.

Questions to ask:

- Which zoning districts currently permit detention facilities?
- Are there existing buildings that could legally be converted to detention uses?
- What reviews normally accompany a change from warehouse storage to continuous human occupancy?
- Which decisions require public hearings?
- Who determines whether additional building, sanitation, or accessibility requirements apply?
- How does the process differ for private, contracted, and federally owned facilities?

What to advocate for

Publicly accessible zoning information, clear review procedures, and advance notice of significant proposed changes in building use.

The Urban Institute has documented how warehouse conversions raise complicated questions about occupancy, infrastructure, and the relationship between local regulations and federal authority. (Urban Institute)

5. Build a coalition before a crisis

No congregation or community organization needs to undertake this work alone.

Bring together faith communities, immigrant-rights organizations, neighborhood associations, environmental groups, public-health advocates, labor organizations, and residents concerned about public infrastructure.

The experience of data-center organizing demonstrates the value of coalitions that connect different concerns around shared demands for transparency, accountable government, and responsible land use.

A coalition can establish relationships with local officials, attend public meetings, monitor proposed developments, and advocate for protective ordinances.

What to advocate for

A community-wide commitment to advance public notice, transparent decision-making, and responsible stewardship of public infrastructure.

This approach also helps ensure that opposition to detention facilities is based on concern for human dignity and community well-being—not hostility toward immigrants or the people who might be detained.

6. Ask local officials to establish safeguards before a detention center is proposed

One important lesson from data-center organizing is that communities benefit from establishing clear standards before developers approach them with a project.

In February 2026, Greensboro, North Carolina, amended its land development ordinance to create a distinct category for secure detention and custodial facilities, identifying where these uses could be permitted and establishing additional development standards. This offers a concrete model for communities considering preventive action. (WUNC News)

Ask local officials to consider the following measures:

Proposed safeguard	Responsible authority	Community benefit
Review local zoning classifications for detention facilities	City council and planning commission	Identifies gaps before a project is proposed
Consider a temporary moratorium on relevant local approvals	City council or county board	Creates time for review, subject to legal authority
Establish public notice and hearing procedures	Planning department and elected officials	Gives residents an opportunity to participate
Adopt infrastructure capacity assessment standards	Water and wastewater authorities	Protects drinking water and sewer capacity
Establish fire and emergency-response review procedures	Fire chief and fire marshal	Identifies threats to detainees and surrounding communities
Assess demands on local hospitals and ambulances	Public health and emergency management agencies	Identifies gaps in healthcare and emergency capacity
Require transparent accounting of public infrastructure costs	Local government and utility boards	Protects residents from unexamined financial burdens

These safeguards should apply consistently within the relevant authority's legal powers. They must not compromise essential water, sanitation, emergency medical care, or fire protection for anyone already detained.

7. Develop a community early-warning system

Communities should not rely exclusively on federal announcements to learn that detention facilities are being considered.

Establish a small group of volunteers who regularly monitor publicly available information, including:

- Planning commission agendas, zoning amendments, and permit applications.
- City council and county commission meeting agendas.
- Publicly available property transactions involving large industrial buildings.
- Water and sewer authority meetings concerning significant new service demands.
- Public notices involving federal environmental reviews.
- Local news reports about proposed warehouse conversions or major federal property acquisitions.

What to advocate for

A public notification process through which local officials share information about major proposed developments as early as legally possible.

The purpose is to identify proposals early enough for meaningful public participation, not to speculate about property owners or publicize unverified rumors.

8. Establish commitments from local officials

Individual meetings are useful, but written commitments and public statements provide greater continuity and public accountability.

Ask elected officials whether they will commit to:

- Reviewing existing protections against unsafe or inappropriate detention-facility development.
- Ensuring that residents receive timely notice of significant proposed changes in land use.
- Seeking independent assessments of relevant infrastructure and public-safety impacts.
- Opposing unnecessary public subsidies or infrastructure expenditures for detention expansion.
- Using available legal authority to require transparency and meaningful public participation.
- Consulting legal experts about applicable state, local, and federal requirements.

These commitments can be incorporated into public resolutions, municipal planning priorities, or departmental procedures, where legally appropriate.

A Sample 30-Day Action Plan

For congregations and community groups. This work can begin with a small team of three to five people.

When	Action	Desired result
Week 1	Identify local elected officials, planning authorities, the fire chief, and water and wastewater utility managers.	Create a list of decision-makers and their responsibilities.
Week 1	Review local zoning regulations concerning detention facilities and warehouse conversions.	Identify existing protections and potential gaps.
Week 2	Schedule meetings with one elected official, the planning department, and the fire department.	Begin relationships and understand existing procedures.
Week 2	Contact the water and wastewater authority about infrastructure capacity and approval processes.	Determine what safeguards already exist.
Week 3	Bring together congregations, community organizations, and interested residents.	Form a coordinated local coalition (doesn't need to be large).
Week 3	Identify one or two changes that local officials could realistically make.	Establish specific advocacy priorities.
Week 4	Request a public meeting, municipal study, or preliminary discussion of protective legislation.	Move from informal conversations to institutional action.
Week 4	Establish a volunteer system to monitor public agendas and relevant proposals.	Maintain readiness for future developments.

What can we learn from the data-center movement?

In 2026, the New Jersey Economic Development Authority issued guidance encouraging municipalities to examine proposed data-center developments through coordinated reviews of infrastructure, emergency response, public services, and community impacts.

The guidance specifically recommends working with municipal engineers, public works departments, water and sewer providers, and local fire districts. (NJEDA)

This is a valuable model for communities concerned about detention expansion: Treat preparedness as an ongoing local government responsibility, rather than an emergency response to a proposed facility.

However, an important legal difference remains. Data centers are generally private developments subject to local land-use controls. Federally-owned detention facilities may not be. Municipalities should therefore develop their strategies in consultation with legal counsel and distinguish between actions they can legally require, agreements they can negotiate, and concerns they can raise through federal environmental review or litigation.

The University of Wisconsin Law School provides a useful overview of these distinctions in its examination of state and local responses to federal detention projects. (Wisconsin Democracy Initiative)

Resources for Further Action

Five resources are especially useful for organizations seeking to turn this guide into local action.

FEATURED · ONLINE RESOURCE LIBRARY

Detention Center Campaign Resources

Powered by Faith online resource library. A growing collection of tools for faith leaders and organizers from Powered by Faith collaborators and national partners. It includes the editable Word version of this toolkit, which you can adapt for your congregation, coalition, or community.

Before Breaking Ground: A Local Government Guide to Better Data Center Policy

Federation of American Scientists (2026). A detailed review of local ordinances, development agreements, infrastructure assessments, and public-policy tools.

A Regional Playbook for Managing Data Center Impacts in the Great Lakes

Alliance for the Great Lakes (2026). Practical checklists for residents and officials concerned about water resources and infrastructure.

State and Local Property Law Responses to Federal Actions

University of Wisconsin Law School (2026). An analysis of the legal possibilities and limitations of local efforts to regulate or challenge detention facilities.

Land Use Detention Center Toolkit from Sam Liccardo

A model ordinance toolkit for communities seeking to use land-use authority to respond to proposed detention facilities.

WATERSHED FAITH

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