



U.S. Immigration
and Customs
Enforcement

FEB 20 2018

MEMORANDUM FOR: Tae D. Johnson
Assistant Director, Custody Management

THROUGH: Jay M. Brooks
Deputy Assistant Director, Detention Management Division

FROM: Gregory J. Archambeault
Field Office Director
San Diego Field Office

SUBJECT: 2-Chlorobenzalmalononitrile (CS Gas) Waiver Request

Purpose

To provide a waiver for the San Diego Contract Detention Facility (CDF), Otay Mesa Detention Center (OMDC), as it relates to Unauthorized Force Devices per the Performance-Based National Detention Standards (PBNDS) 2011, Part 2.15 Use of Force and Restraints, Section G.5.b.

Background

Per PBNDS 2011, Part 2.15 Use of Force and Restraints, Section G.5.b, Unauthorized Force Devices, states the following devices are not authorized: mace, CN, tear gas, or other chemical agents, except OC spray. CoreCivic utilizes CS gas. It is less toxic than CN, however it is 10 times more toxic than OC spray ("PoliceLink," n.d.).

Discussion

OMDC has chemical drop ports in 14 general population housing pods. Each of the housing pods holds a maximum capacity of 128 detainees. OMDC requests a waiver for the use of CS gas as it relates for use during a disturbance riot where OC spray would be ineffective in gaining control of the situation in order to protect life and/or property.

Recommendation

I recommend authorization of a waiver for the San Diego CDF for PBNDS Part 2.15 Use of Force and Restraints, Section G.5.b due to security concerns of gaining control of detainees during a disturbance riot.

Date Authorized _____
Date Modified _____

Date Not Authorized _____
Needs More Discussion _____

Facilities shall use only restraints/non-deadly force devices that are approved by facility policy and in a manner consistent with their policy and training.