
April 23, 2026

COMMUNITY REPORT

100 Midland Avenue, Glenwood Springs, Colorado

This document is written for three audiences. Community members who want to understand what is happening at 100 Midland Avenue will find plain-language explanations in Part One and Part Three. Journalists covering the April 28 hearing will find the complete timeline in Part Two and the source documentation in Part Six. Glenwood Springs City Council members and Planning and Zoning Commissioners will find the legal framework and authority questions in Parts Four and Five. Every factual assertion is supported by documentary evidence. The full Comprehensive Legal Analysis is a companion document available on request.

The City has taken steps to address concerns raised about this facility. This document explains why those steps, while necessary, do not address the most serious issues, and why the April 28 hearing is the first opportunity in twenty-one years for those issues to be examined by a body with authority to act.

April 28, 2026 Hearing: The Planning and Zoning Commission of the City of Glenwood Springs will hold a public hearing on Special Use Permit No. 4-04, which authorizes the ICE detention facility at 100 Midland Avenue. This is a public hearing. Community members may attend and submit written comments.

PART ONE: THE FACTS

What Is 100 Midland Avenue?

100 Midland Avenue, Suite 210, is an Immigration and Customs Enforcement detention facility in Glenwood Springs, leased under a federal contract with the General Services Administration. People apprehended by immigration enforcement in Garfield County and surrounding areas are taken there, processed, and held before being transferred to other facilities or deported.

What Is a Certificate of Occupancy, and Why Does It Matter?

A Certificate of Occupancy is the official document a city issues to confirm that a building has been inspected, meets all applicable safety codes, and is legally authorized for its stated use. Under the International Building Code, a building may not be occupied without a valid Certificate of Occupancy.

The Temporary Certificate of Occupancy for 100 Midland Avenue, Suites 110 and 210, expired in June 2005. After that time, no Certificate of Occupancy was ever issued. The facility has operated for 7,620 days since that expiration without a valid occupancy authorization. Community Development Director Trent Hyatt confirmed this in his February 25, 2026 post-inspection letter, stating that the City is "unable to determine that a full certificate of occupancy (CO) was issued."

What Kind of Building Is This Supposed to Be?

Detention facilities are classified Group I-3 under International Building Code Section 308.5. Group I-3 is the most restrictive occupancy classification in the building code. It applies to buildings where occupants cannot evacuate on their own because they are under restraint. The classification triggers a mandatory set of inspection requirements, evacuation plan requirements, fire suppression verification standards, and locking hardware standards that do not apply to ordinary office buildings.

100 Midland Avenue has never been inspected under Group I-3 standards. The February 25, 2026 inspection was the first comprehensive inspection in twenty-one years, and it found the facility out of compliance.

What Did the February 2026 Inspection Find?

The City conducted a building inspection of 100 Midland Avenue on February 25, 2026. It was the first comprehensive inspection in twenty-one years of operation. The inspection documented the following:

- Emergency lights that did not function.
- Sprinkler heads more than 20 years old with no inspection history.
- Smoke detection systems that had never been verified.
- Locking hardware on detention rooms that had never been verified to release in an emergency.
- An evacuation plan providing twelve words of guidance on what to do with detainees in a fire: "If detainees are present in holding cells, securely move them to vehicles." Federal fire code, IFC Section 408.3, requires Group I-3 facilities to have detailed emergency response protocols including detainee notification procedures, staff response assignments, coordination with emergency responders, and designated evacuation routes. The plan also lists the wrong building address.

What Did the City Do About These Violations?

Before the February 2026 inspection, the City had already issued two Orders to Comply for code violations at 100 Midland Avenue, one in March 2025 and one in May 2025. The City took no enforcement action on either order. In mid-2025, the City yellow-tagged the building for fire protection system deficiencies. No enforcement action followed. The facility continued to operate while holding a restrained population under documented open code violations for approximately eight months.

After the February 2026 inspection, the City issued no Notice of Violation and no Order to Vacate. The City's March 5, 2026 press statement called the 21-year absence of a Certificate of Occupancy "clerical or administrative oversight." The inspection report was not finalized for 43 days and was not produced to legal counsel until 15 days before the April 28 hearing.

The City's recent statements and the April 9 fire inspection may appear to signal that safety concerns have been resolved. They have not. The April 9 inspection assessed this facility as a general commercial office—not as the detention facility it legally is. The Group I-3

safety requirements that apply specifically because people are locked inside this building and cannot get themselves out have never been evaluated.

PART TWO: THE COMPLETE TIMELINE

| Date | What Happened and Source |
|-------------------------|--|
| May 7, 2003 | GSA representative Russell Fury applies for Special Use Permit. Application states: max 55 detainees, held no longer than 12 hours, 5 employees. (SUP Application) |
| May 27, 2003 | City of Glenwood Springs grants Special Use Permit No. 4-04. |
| May 17, 2004 | City Attorney Karl C. Hanlon signs Special Use Permit No. 4-04 as to form. (Special Use Permit No. 4-04) |
| June 2, 2004 | Contractor signs written acknowledgment of Building Permit Conditions List, including conditions for lighting, fire suppression, egress hardware, smoke detection, and locking mechanisms, all required prior to final CO. (Permit No. 04-0113 Conditions List) |
| December 14, 2004 | Temporary Certificate of Occupancy No. M.79 issued. Expiration: June 12, 2005. Occupancy classified Group B/I-3. (Permit No. 04-0113) |
| June 12, 2005 | Temporary CO expires. No final CO issued. Facility continues operating. (Permit Master File) |
| 2005 to 2024 | No Group I-3 inspection conducted. No enforcement action. No final CO issued. Facility operates continuously. |
| March 2025 | City issues Order to Comply No. 1 for building code violations. No enforcement action taken. |
| May 2025 | City issues Order to Comply No. 2 for building code violations. No enforcement action taken. |
| Mid-2025 | City issues yellow tag for fire protection system deficiencies. No enforcement action. Facility continues operating with restrained detainee population. |
| January to October 2025 | 73 detainees processed at 100 Midland Avenue. 45% have no criminal record. |
| February 25, 2026 | First comprehensive building inspection. Hyatt post-inspection letter confirms City cannot determine final CO was ever issued. Life safety deficiencies documented. (Hyatt Letter, February 25, 2026) |
| March 5, 2026 | City press statement attributed to City Manager Steve Boyd calls 21-year CO absence "clerical or administrative oversight." On the same date, Boyd states to Aspen Journalism that City is "still trying to confirm the data." |
| April 9, 2026 | 43 days after initial Feb 25 inspection, Fire Marshal Robin Pitt conducts second fire inspection. Inspection does not address Group I-3 evacuation plan requirements under IFC Section 408.3. (Pitt Fire Inspection Report, April 9, 2026) Facility allowed to continue operations between initial inspection and second inspection. |
| April 13, 2026 | Building inspection report produced to legal counsel. 15 days before the April 28 hearing. |
| April 28, 2026 | Planning and Zoning Commission hearing on Special Use Permit No. 4-04. |

PART THREE: LIFE SAFETY



Image of the Coal Seam Fire, 2002

What Happens in a Fire at a Detention Facility?

In a standard building, when a fire alarm sounds, people walk to the nearest exit. In a detention facility, the people inside cannot do that. They are locked in rooms. To get out safely, they depend entirely on staff and functioning mechanical systems, including unlocking hardware, smoke barriers, designated evacuation routes, and trained staff response protocols.

This is why IBC Section 308.5 creates the Group I-3 classification and why IFC Section 408 requires detailed evacuation plans for Group I-3 facilities. The legal responsibility for ensuring these systems work falls on the building owner, the facility operator, and the municipality that authorized the use.

What Are the Specific Risks at 100 Midland Avenue?

- Emergency lighting that does not function means that detainees and staff cannot see exit routes during a power failure or smoke event.
- Sprinkler heads more than 20 years old with no inspection history may not activate or may not provide adequate coverage in a fire.
- Locking hardware that has never been verified means the doors on detention rooms may not unlock during an emergency, trapping occupants.
- A twelve-word evacuation plan means there is no documented procedure for staff to follow, no designated route to a safe assembly area, no procedure for accounting for all detainees, and no coordination plan for fire department responders.

-
- A facility without a Certificate of Occupancy means no regulatory authority has ever verified that any of these systems meet the standards required for a Group I-3 occupancy.

Seventy-three people were detained at 100 Midland Avenue between January and October 2025. Every one of them was held in a building where the City of Glenwood Springs had never verified that the fire suppression systems functioned, the doors would unlock in an emergency, or that staff had a lawful and compliant plan to evacuate them.

What Is the City's Legal Obligation?

IBC Section 116.1 provides that structures constituting a distinct hazard to life "shall" be ordered vacated. Under C.R.S. Section 2-4-401(11.5), "shall" imposes a mandatory duty. The Building Official does not have discretion to decline to issue a vacate order when the predicate conditions are documented. Those conditions are documented in the City's own February 2026 inspection record. The Building Official has not acted.

PART FOUR: THE SPECIAL USE PERMIT

What Is a Special Use Permit?

A Special Use Permit (SUP) is an authorization from the City allowing a specific land use that is not automatically permitted in a zoning district. The City granted SUP No. 4-04 in 2003 based on a formal application representing that the facility would process detainees held no longer than 12 hours, with a maximum of 55 detainees. The permit was issued subject to conditions, including compliance with all building permit requirements. City Attorney Karl C. Hanlon signed the permit as to form on May 17, 2004.

How Has the Use Changed Since 2003?

The conditions described in the 2003 application bear little resemblance to current operations. The facility is now operated by ICE under a GSA lease, with no amendment to the SUP on record. The Homeland Security Investigations Special Agent in Charge office occupies suites in the same building, with HSI agents serving as voting members on the SPEAR task force Governing Board. This extends the building's function into law enforcement intelligence operations that were never contemplated in the 2003 application.

What Can the Commission Do on April 28?

Under Glenwood Springs Municipal Code Title 070 (the City's land use code), the Planning and Zoning Commission has authority to revoke, modify, or impose new conditions on a Special Use Permit. Based on the record, the Commission can:

- Find that the current use does not satisfy the conditions of the original SUP and that the permit cannot be renewed or extended without a valid Certificate of Occupancy for Group I-3 use.
- Find that material changed conditions require a new SUP application reflecting current operations, as authorized under Colorado land use law, C.R.S. Section 29-20-104.
- Refer the life safety violations to Building Official Victor Meraz for mandatory enforcement action under IBC Section 116.1.

-
- Require the recusal of City Attorney Karl Hanlon from advising the Commission given his original signature on Special Use Permit No. 4-04.

PART FIVE: CONFLICT OF INTEREST

City Attorney Karl C. Hanlon

Karl Hanlon signed Special Use Permit No. 4-04 as City Attorney on May 17, 2004. He remains City Attorney today. He has managed the City's response to the building code violations at 100 Midland Avenue, has made redaction decisions in Colorado Open Records Act (CORA) productions covering communications in which he is named, and will advise the Planning and Zoning Commission at the April 28 hearing on the permit he originally signed. The attorney who authorized the detention facility in 2004 is the same attorney who will advise the body deciding in 2026 whether to revoke, renew, or modify that authorization. This conflict has not been disclosed to the Commission or the public.

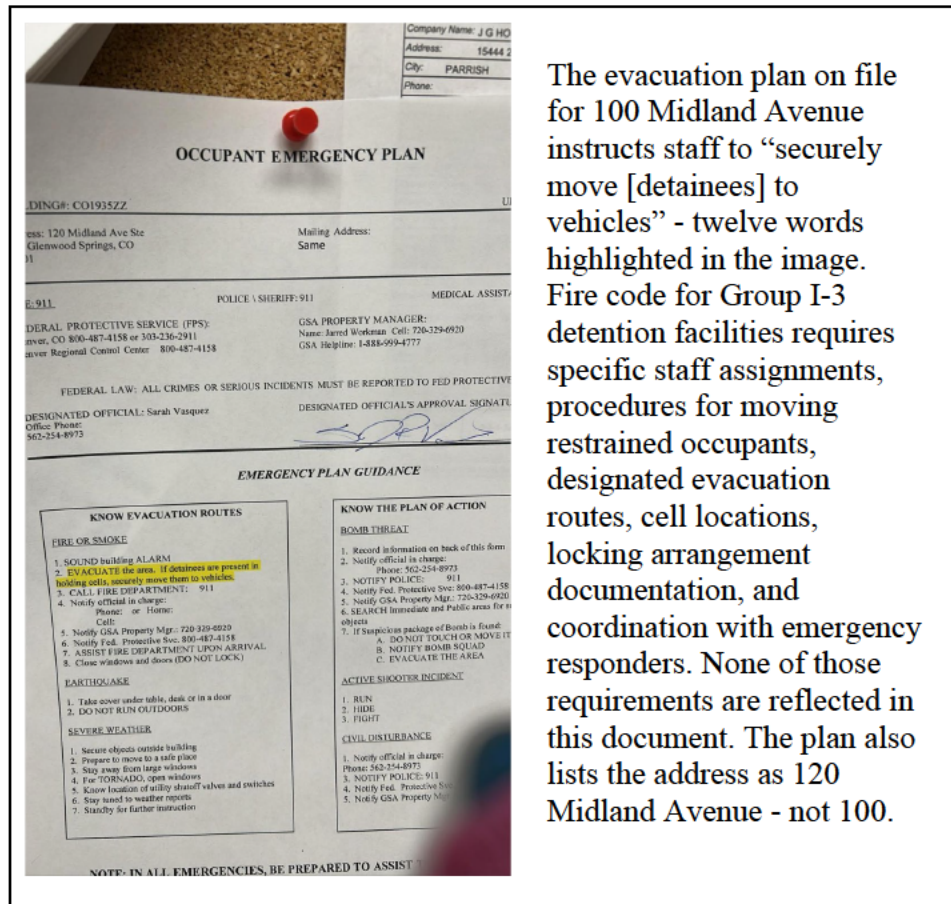
PART SIX: SOURCES AND HOW TO VERIFY THEM

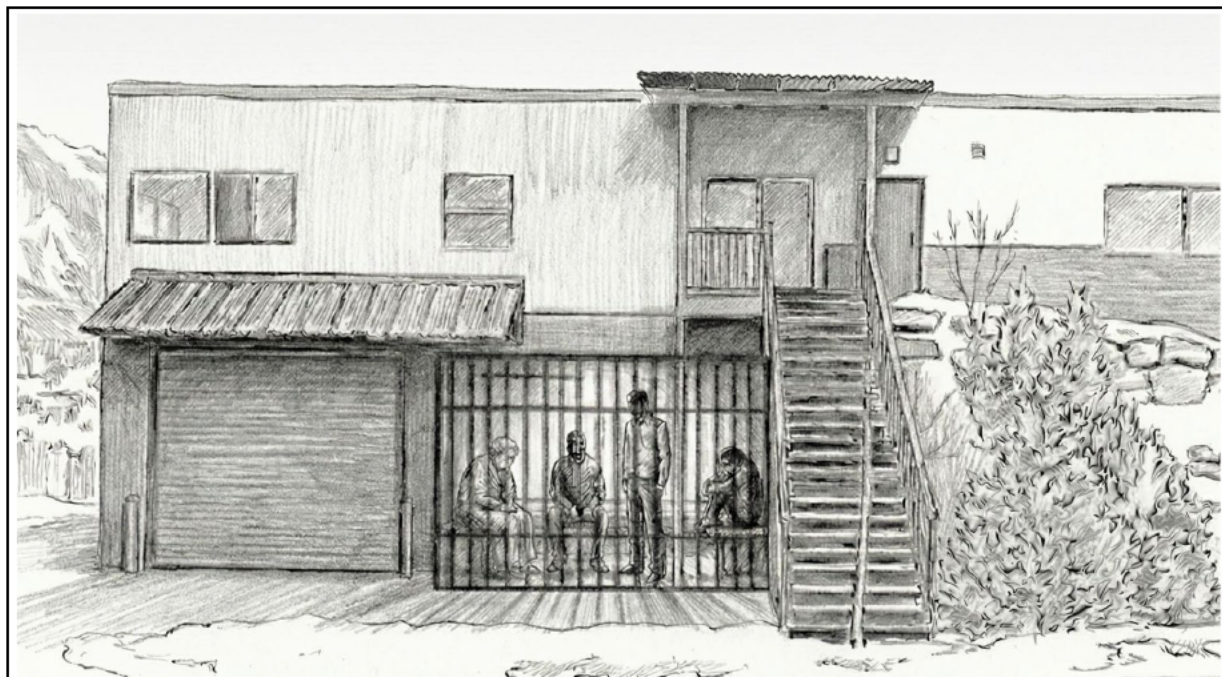
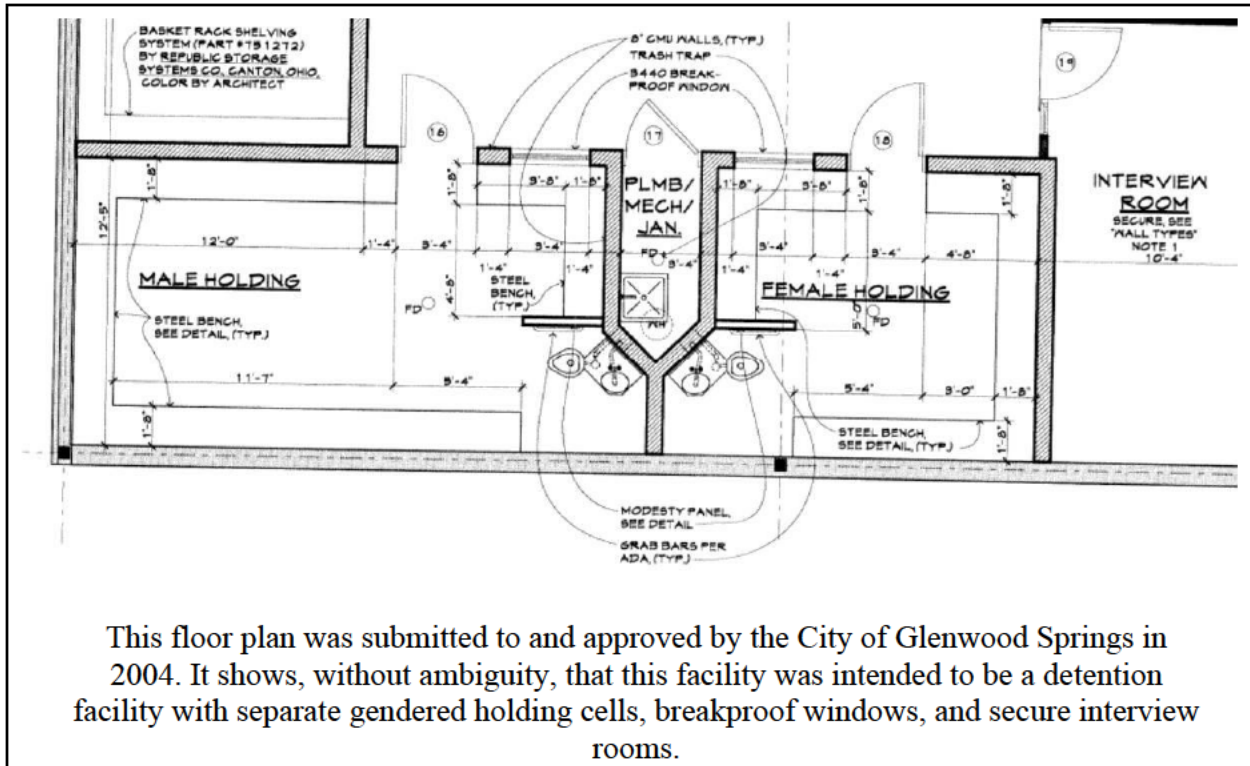
Every factual assertion in this document is supported by one or more of the following sources. Each source is either a document in the City's official file or a City-issued record obtained through a CORA request.

- Trent Hyatt post-inspection letter, February 25, 2026: City's written admission that the City cannot determine a final CO was issued for 100 Midland Avenue, Suites 110 and 210.
- Building Permit No. 04-0113 and Permit Master File: Establishes the Temporary Certificate of Occupancy issuance date, expiration date of June 12, 2005, and Group B/I-3 occupancy classification.
- Building Permit Conditions List with contractor acknowledgment, June 2, 2004: Establishes the mandatory conditions required prior to final CO issuance that were never satisfied.
- Special Use Permit No. 4-04, signed Karl C. Hanlon as City Attorney, May 17, 2004: Establishes the original authorization and its conditions.
- GSA representative Russell Fury application letter to City Planner Jill Peterson, May 7, 2003: Establishes the original representations on which the SUP was granted.
- February 25, 2026 building inspection report, finalized April 9, 2026: Documents all life safety deficiencies.
- Orders to Comply, March 2025 and May 2025: Documents the City's awareness of code violations and its failure to enforce them.
- CORA email production, produced February 10, 2026, including the Hyatt-Brumbaugh-Workman-Vasquez CO remediation email thread: Establishes City internal communications regarding the CO status.
- Robin Pitt April 9, 2026 fire inspection report: Documents the scope and limitations of the fire inspection conducted 19 days before the hearing.
- SimplexGrinnell inspection report, 2016: The only prior fire suppression inspection document identified in the entire 21-year record.

- Occupant Emergency Plan submitted to and accepted by the City: The twelve-word evacuation plan.
- City of Glenwood Springs press statement attributed to City Manager Steve Boyd, March 5, 2026: The "clerical oversight" characterization.

The attorney who approved this facility in 2004 without verified life safety systems is now the attorney advising the body that must decide whether those failures have consequences. That conflict is one of many issues documented in this report. Taken together, they describe not a series of isolated oversights but a twenty-one year pattern in which every layer of local accountability—the permit process, the safety inspection record, the enforcement system, the legal office—failed the people locked inside that building.





Artist rendering of the interior of the ICE Hold Room in Glenwood Springs (GSCHOLD), based upon public records and descriptions of formerly detained community members.