

Immigration

POSITION

The commercial real estate industry thrives when properties are safe, stable, and inclusive. BOMA/GLA believes that immigration policy and enforcement must balance lawful compliance with respect for worker rights, property operations, and community safety. Property managers and service providers should not be placed in the position of acting as de facto immigration enforcement agents.

As such, we:

- Support clear, consistent federal, state, and local policies that define the role of employers and property managers during immigration enforcement actions.
- Support resources and training for property managers and service providers to understand their legal obligations, workplace rights, and best practices when interacting with enforcement agencies.
- Oppose Policies or practices that require property managers or owners to act beyond their legal obligations in immigration enforcement.
- Oppose Enforcement actions that cause unnecessary disruption to commercial properties, tenants, or employees without adherence to due process and proper notification.
- Oppose Regulations that create legal ambiguity, exposing property stakeholders to liability or conflicting legal obligations related to immigration enforcement.

BACKGROUND

Greater Los Angeles is home to one of the largest and most diverse immigrant populations in the United States. Immigrant labor forms the backbone of multiple industries essential to the region's economy, including commercial real estate. BOMA/GLA members rely on a wide range of skilled and unskilled workers—many of whom are immigrants—to operate, maintain, and

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secure buildings across Los Angeles County. These workers include building engineers, HVAC technicians, security officers, janitors, day porters, construction laborers, parking attendants, landscapers, tenant service contractors, and food service staff. Immigrant workers are therefore deeply integrated into every layer of commercial building operations, contributing significantly to safety, functionality, and tenant satisfaction.

According to statewide estimates, immigrant workers comprise more than one-third of California's labor force. In Los Angeles County, immigrants account for nearly 45% of the workforce, a share substantially higher than most major metropolitan regions. The property services industry reflects this reality. Approximately 120,000 union and non-union janitors support California's private-sector built environment, representing roughly 60% of the janitorial workforce. Similar patterns exist in building engineering, maintenance, and contracted building services where immigrant labor fills a substantial portion of critical roles. These workers perform indispensable functions that keep commercial properties operational, compliant, and safe for tenants and visitors.

In recent years, highly visible federal immigration enforcement actions, including workplace raids and surprise site visits, have created significant anxiety for employers, property managers, service providers, and workers. While immigration policy and enforcement remain federal responsibilities, the effects of these actions are felt directly in commercial properties. Building teams and contractors have reported disruptions to operations, confusion about legal requirements, and uncertainty about how to appropriately respond when federal agents arrive at or near a commercial site. Property managers increasingly face questions about visitor access, security protocols, due process, and their obligations under overlapping federal, state, and local laws.

Mass enforcement actions also pose broader economic risks. Studies indicate that large-scale deportations could remove hundreds of thousands of workers from California's economy, creating an estimated \$275 billion in lost revenues, wages, and tax contributions. For the commercial real estate industry, reductions in available building personnel, particularly in engineering, maintenance, janitorial, construction, and security—would further strain an already tight labor market. Such outcomes could impede building operations, drive up service costs, create delays in tenant improvements, and reduce the overall stability of commercial property teams.

BOMA/GLA members are not immigration authorities. They are employers, property managers, service providers, and community stakeholders responsible for maintaining safe, functional, and legally compliant workplaces. Members report concerns about being placed in positions where unclear or conflicting government directives could expose them to liability. They also express apprehension regarding the potential for enforcement actions to cause fear among



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building staff, disrupt day-to-day operations, affect vendor workforce stability, and create reputational challenges with tenants who expect seamless operations regardless of outside events.

Given Los Angeles' status as a diverse global metropolis and the commercial real estate industry's reliance on immigrant labor at all levels, from entry-level building services to highly skilled trade, immigration policy has a direct and meaningful impact on the buildings BOMA/GLA members oversee. Members have a uniquely grounded perspective on how policy ambiguity, inconsistent enforcement practices, or unexpected field actions can affect building stability, workforce reliability, and the safety and wellbeing of employees and tenants. The commercial real estate industry depends on predictability. When enforcement practices are inconsistent or unclear, the result is confusion, operational strain, and unnecessary risk for property managers who are simply carrying out their responsibilities. As long-standing members of the business community, BOMA/GLA is committed to ensuring that immigration policy and its implementation support lawful compliance while also safeguarding workplace stability, worker dignity, and the operational integrity of commercial properties throughout Los Angeles County.