

Communication from Public

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Comments for Public Posting: During the aftermath and rebuild efforts for the fires that recently surrounded Los Angeles, the Sunita Jain Anti-Trafficking Initiative urges Los Angeles City to consider the evidence-based data that shows a clear link between human trafficking and responses to natural disasters and integrate this into the city short and long term coordinated response. Documented instances include: • Construction workers: Alarming, a 2024 study documented that 32% of workers in post-disaster construction reported experiencing labor trafficking. • Domestic workers and day laborers: In desperate situations, completely unemployed at a moment's notice, with no unemployment benefits and no access to any government support, many find themselves vulnerable to recruitment into sex and/or labor trafficking. • Hospitality and maid service workers: Labor trafficking has been documented in workers maintaining hotels for displaced residents. • First responder contract firefighters: Are often undocumented or on temporary work visas, and vulnerable to human trafficking. Given this evidence-based data, SJI recommends that as LA City responds to this disaster, it should:

1. Increase Public Awareness: Raise awareness about the risk of trafficking in Los Angeles in the wake of natural disasters. The City can play a critical role in educating community members on how trafficking often increases after natural disasters and where to turn for help. Offers that are "too good to be true" for housing or employment often can be traffickers seeking to exploit vulnerable LA City residents.
2. Provide training on the connection to human trafficking and natural disasters to all city workers involved in disaster preparedness and response efforts so that preventing trafficking is part of the integrated planning and response process
3. Review Procurement Policies: Update LA City procurement policies to prevent labor trafficking in goods purchased as LA City rebuilds.
4. Review Disaster Relief Policies/Increase Worker Protection Enforcement Efforts: Focus on construction workers to ensure policies are robust and protections already in place in Los Angeles City are enforced to better prevent human trafficking in rebuilding efforts.
5. Provide Supportive Services: Offer support for domestic workers, day laborers, or others who have lost employment or homes due to fires in Los Angeles and are now

more vulnerable to sex and/or labor trafficking. Los Angeles can prevent trafficking before it starts with proactive policies and responses.



PROTECTING WORKERS FROM TRAFFICKING IN DISASTER RELIEF EFFORTS

The link between human trafficking and responses to natural disasters is well-documented.¹ One of the largest labor trafficking cases in the United States, *David et al. v. Signal International LLC et al.*, involved individuals recruited to rebuild and repair oil rigs and marine facilities damaged by Hurricane Katrina nearly 20 years ago. A 2024 study further highlighted this connection, revealing a significant prevalence of labor trafficking among construction workers engaged in post-disaster recovery. Specifically, surveys of 903 construction workers in Houston, conducted between August 2022 and August 2023, found that over 77% had experienced either labor trafficking or labor exploitation while working in construction. Based on these findings, researchers estimated that more than one in five construction workers in Houston have experienced labor trafficking in the construction industry during their lifetimes.²

The construction industry is consistently among the top sectors for identified labor trafficking cases. For instance, in 2021, the National Human Trafficking Hotline reported that the most common industries for labor trafficking were domestic servitude, agriculture, and construction (NHTH, 2022). Additionally, a 2014 study focusing on undocumented migrant workers in San Diego found that labor abuses were most prevalent in construction and janitorial services. (Zhang, Spiller, Finch, & Qin, 2014).

Systemic problems inherent within the construction industry contribute to worker vulnerability. For instance, labor exploitation can occur due to an abundance of workers being misclassified as independent contractors rather than employees, making them ineligible for labor protections such as unemployment and workers' compensation (Galemba, 2023). Additionally, many workers in the construction industry are either undocumented (Passel & Cohn, 2016; Svajlenka, 2020) or have an H-2B guestworker visa (GAO, 2020), both of which are groups more vulnerable to workplace exploitation (Fussell, 2011; Gleeson, 2010; Juravich et al., 2015; Southern Poverty Law Center, 2014). There have also been instances where workers with H-2A visas, intended for agricultural jobs, were illegally redirected to reconstruction efforts.³

As climate change intensifies the frequency and severity of natural disasters, the demand for construction workers in recovery and reconstruction efforts is expected to rise. This escalating need underscores the critical importance of addressing labor trafficking within the construction industry. Alarming, the same 2024 study in Houston revealed that 32% of workers in post-

¹ Katherine Hoogesteyn, et. al. *The Intersection of Human Trafficking and Natural Disasters: A Scoping Review TRAUMA, VIOLENCE, & ABUSE* 2024, Vol. 25(4) 2877–2890. Available at [hoogesteyn-et-al-2024-the-intersection-of-human-trafficking-and-natural-disasters-a-scoping-review.pdf](https://www.hoogesteyn-et-al-2024-the-intersection-of-human-trafficking-and-natural-disasters-a-scoping-review.pdf)

² Kelle Barrick et al. Labor Trafficking in Construction During the Recovery and Reconstruction from a Natural Disaster (Sept. 2024) at 5. Available at https://www.acf.hhs.gov/sites/default/files/documents/opre/opre-HTPRAP-natural-disasters-oct24_0.pdf

³ Department of Health and Human Services, *Trafficking Prevention and Disaster Response* at 10 (Feb. 2018). Available at <https://nhhtac.acf.hhs.gov/sites/default/files/2020-02/Trafficking%20Prevention%20and%20Disaster%20Response%20Literature%20Review.pdf>



disaster construction reported experiencing labor trafficking, compared to 22% of the overall sample. These workers also faced higher rates of withheld pay or benefits, illegal recruitment fees, and threats of violence or denunciation to authorities. For instance, 25% paid illegal recruitment fees to secure these positions. Additionally, post-disaster relief workers also reported higher rates of threats of physical violence (6% vs. 1%), threats of harm to a personal or professional reputation (5% vs. 1%), and threats of denunciation to authorities (3% vs. 1%).⁴ These findings highlight the heightened vulnerability of construction workers in post-disaster scenarios and the urgent need for protective measures to prevent labor trafficking in such contexts.

Although no such research has been conducted in California, reports of exploitation and trafficking emerged from the Tubbs and Kincade fires in 2017 and 2019. Domestic workers and day laborers found themselves abruptly unemployed, without access to unemployment benefits or government aid, increasing their vulnerability to human trafficking.⁵ Additionally, some workers remained in mandatory evacuation zones to continue earning a living, further exposing themselves to hazardous conditions and potential exploitation.

Even first responders, such as firefighters, have been documented to be vulnerable to human trafficking. According to the American Immigration Council, many firefighters in California are Mexican-born on temporary work visas.⁶ Additionally, up to 30% of those fighting Los Angeles County fire fires are incarcerated individuals earning \$10 a day.⁷

Labor needs and subsequent exploitation following natural disasters extend beyond construction and debris cleanup. Some trafficking victims have been employed in hospitality and maid services to accommodate displaced residents.⁸ Furthermore, sex trafficking has been documented to increase post-disaster due to heightened social and economic distress.⁹

⁴ *Id.* at 9

⁵ The Guardian, *Laborers and domestic workers stay behind as thousands flee California wildfires* (2019) Available at <https://www.theguardian.com/us-news/2019/oct/30/california-fires-workers-kincade-easy>

⁶ American Immigration Council, *On the Beat": New Roles and Challenges for Immigrant Police and Firefighters* (Dec 2007) at 3 Available at

<https://www.americanimmigrationcouncil.org/sites/default/files/research/On%20the%20Beat%2012-07.pdf>; See also NPR, *Some Of The Firefighters Battling The Caldor Fire Are Mexican Nationals On Work Visas*; (Sept 2021). Available at <https://www.npr.org/2021/09/08/1035224871/some-of-the-firefighters-battling-the-caldor-fire-are-mexican-nationals-on-work->; Jean Guerro, *These people are baring the brunt of California's Climate Crisis*, LA Times (Oct 2021) Available at <https://www.latimes.com/opinion/story/2021-10-28/farmworkers-immigrants-wildfires-california-climate-crisis>

⁷ Forbes, *Exploitation on the frontlines of L.A.'s raging fires* (Jan 9, 2025)

<https://www.forbes.com/sites/dougmelville/2025/01/09/inmates-makes-up-nearly-a-third-of-those-fighting-la-fires/>

⁸ Department of Health and Human Services, *Trafficking Prevention and Disaster Response* at 10 (Feb. 2018).

Available at <https://nhhtac.acf.hhs.gov/sites/default/files/2020-02/Trafficking%20Prevention%20and%20Disaster%20Response%20Literature%20Review.pdf>

⁹ *Id.* at 9



Recommendations:

1. **Increase Public Awareness¹⁰:** Educate the public about the risks of human trafficking in Los Angeles County, particularly in the aftermath of natural disasters, and provide information on available resources.
2. **Review Los Angeles County Procurement Policies:** Update procurement policies for all LA County and California contracted goods to prevent human trafficking. See additional information [here](#).
3. **Review Policies for Disaster Relief Efforts and Construction Workers:** Ensure robust and protective measures are in place to prevent human trafficking during rebuilding efforts. Disaster relief strategies should incorporate human trafficking prevention content, and all disaster response staff should be trained.¹¹
4. **Support Statewide Legislation:** Protect temporary workers in California, especially those on temporary visas, including first responder firefighters. See additional information [here](#).
5. **Provide Supportive Services¹²:** Offer assistance to domestic workers, day laborers, and others who have lost employment due to fires in Los Angeles, rendering them more vulnerable to sex and/or labor trafficking.

Protecting workers impacted by the fires and those contributing to rebuilding efforts in Los Angeles is crucial, especially considering the ongoing fires in Los Angeles County. It is imperative to uphold their safety and rights and to implement preventive measures against exploitation.

ABOUT SUNITA JAIN ANTI-TRAFFICKING INITIATIVE

The Sunita Jain Anti-Trafficking Policy Initiative (SJI) is a practitioner-led, survivor-informed, evidence-based, and community-informed think tank that intentionally fills gaps in human trafficking through an intersectional framework that fosters systemic change and progressive policy innovations.

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¹⁰[Outreach materials in English and Spanish for workers to prevent trafficking in Natural Disasters](#). In 2017 the City of Houston also developed specific outreach materials about human trafficking and disaster response <https://humantraffickinghouston.org/toolkits/emergency-disaster-response-toolkit/>

¹¹ Disaster Management: Preventing and Responding to Human Trafficking This 30-minute SOAR Online training equips disaster management professionals with strategies to prevent, identify, and respond to human trafficking during and after emergencies, emphasizing trauma-informed and culturally appropriate care. Available at train.org/main/course/1100469/; See also [Guide for Disaster Management Professionals](#)

¹² Department of Human Services (December 2024) [Disaster Human Services Capabilities Playbook](#)