

# Climate Assessment

Office of Legislative Oversight

## **BILL 3-26: ADMINISTRATION – IMMIGRATION ENFORCEMENT GUIDANCE – REQUIRED (THE COUNTY VALUES ACT)**

### **SUMMARY**

The Office of Legislative Oversight (OLO) anticipates Bill 3-26 will likely have no impact on the County's contribution to addressing climate change as it is proposing changes to how County employees engage with federal immigration officers.

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### **BACKGROUND AND PURPOSE OF BILL 3-26**

Last May, the state adopted the Maryland Values Act in response to the Trump administration's nationwide campaign of mass harassment and detainment of immigrants. Among other measures, the Act prohibits certain state and local schools, libraries, and other institutions from granting federal personnel access to areas not accessible to the public and requires the Attorney General to publish guidance on immigration enforcement actions at sensitive locations.<sup>1</sup>

Modeled on the Maryland Values Act, Bill 3-26 ("The County Values Act") seeks to reaffirm the County's values of "equity, inclusiveness, dignity, and justice for all." It also seeks to safeguard community trust and equitable access to County services and facilities amid ongoing Immigration and Customs Enforcement (ICE) enforcement activity. The Bill aims to achieve these ends by:

- Restricting ICE officers from accessing non-public areas of County facilities without a valid federal judicial warrant;
- Prohibiting the use of County-owned or-controlled parking lots, garages, and vacant lots for immigration enforcement activities while requiring County employees to report any unauthorized use of County property to their department directors; and
- Requiring the County Executive to provide detailed immigration enforcement guidance for County staff and contractors, while requiring departments to train staff on these guidelines.<sup>2</sup>

The County Council introduced Bill 3-26, Administration – Immigration Enforcement Guidance – Required, on January 20, 2026.

## ANTICIPATED IMPACTS

Community resilience includes housing, healthcare, infrastructure, and the well-being of community members – the more resources a community has, the better a community can respond to natural disasters and storms.<sup>3</sup>

Policies meant to protect immigrants, such as ensuring County employees will not allow federal immigration enforcement officials access to County buildings or share information about a County resident’s immigration status, can make County residents who are also immigrants feel safer. However, it has been noted by residents and nonprofits in other jurisdictions with similar immigrant protection policies, that immigrants, especially those who are facing insecure citizenship status, still face structural barriers in accessing government services that provide basic necessary resources like food, healthcare, housing, and stable employment.<sup>4</sup>

This is due in part, to anti-immigrant federal policy which causes hesitation amongst immigrant communities in interacting with government at any level.<sup>5</sup> Local policies that promote safety and protection for immigrants can help immigrant communities feel safer but overall cannot regulate federal immigrant policy nor prevent immigration enforcement from entering a jurisdiction.<sup>6</sup> Instead, local policies can build trust between local governments and immigrant communities and aim to increase access to local resources.<sup>7</sup>

FEMA asserts in its National Resilience Guidance that long-term strains on communities, such as food insecurity and social injustice, can impact a community’s overall resilience.<sup>8</sup> While there is a link to community resilience and immigrant protection policies, the overall impact is unclear on how these policies affect immigrants’ access to vital resources, such as food, affordable housing, stable employment, and healthcare, which would increase their capacity to respond to natural disasters and storms.<sup>9</sup>

As the Bill proposes changes to how County employees engage with federal immigration officers, OLO anticipates Bill 3-26 will have no impact on the County’s contribution to addressing climate change, including the reduction and/or sequestration of greenhouse gas emissions, community resilience, and adaptive capacity.

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## RECOMMENDED AMENDMENTS

The Climate Assessment Act requires OLO to offer recommendations, such as amendments or other measures to mitigate any anticipated negative climate impacts.<sup>10</sup> OLO does not offer recommendations or amendments as Bill 3-26 is likely to have no impact on the County’s contribution to addressing climate change, including the reduction and/or sequestration of greenhouse gas emissions, community resilience, and adaptive capacity.

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## CAVEATS

OLO notes two caveats to this climate assessment. First, predicting the impacts of legislation upon climate change is a challenging analytical endeavor due to data limitations, uncertainty, and the broad, global nature of climate change. Second, the analysis performed here is intended to inform the legislative process, not determine whether the Council should enact legislation. Thus, any conclusion made in this statement does not represent OLO's endorsement of, or objection to, the bill under consideration.

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## PURPOSE OF CLIMATE ASSESSMENTS

The purpose of the Climate Assessments is to evaluate the anticipated impact of legislation on the County's contribution to addressing climate change. These climate assessments will provide the Council with a more thorough understanding of the potential climate impacts and implications of proposed legislation, at the County level. The scope of the Climate Assessments is limited to the County's contribution to addressing climate change, specifically upon the County's contribution to greenhouse gas emissions and how actions suggested by legislation could help improve the County's adaptive capacity to climate change, and therefore, increase community resilience.

While co-benefits such as health and cost savings may be discussed, the focus is on how proposed County bills may impact GHG emissions and community resilience.

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## CONTRIBUTIONS

OLO staffer Kaitlyn Simmons drafted this assessment.

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<sup>1</sup> Maryland General Assembly, [HB 1222, Public Safety – Immigration Enforcement](#), 2025 Regular Session (effective June 1, 2025).

<sup>2</sup> See full bill text in Montgomery County Council, [Introduction Staff Report for Bill 3-26, Administration – Immigration Enforcement Guidance – Required](#) (January 20, 2016).

<sup>3</sup> [National Institute of Standards and Technology, "Community Resilience", Accessed 1/7/2025.](#); [Federal Emergency Management Agency, "Community Resilience: National Risk Index", Accessed 1/7/2025.](#); [Federal Emergency Management Agency, "National Resilience Guidance: A Collaborative Approach to Building Resilience", August 2024.](#)

<sup>4</sup> [Houston, A. R., Salhi, C., and Lincoln A. K., "Messaging inclusion with consequence: U.S. sanctuary cities and immigrant wellbeing", July 22, 2023.](#); [Bruce, B. and Crettex, L., "The Invisible Boundaries of Sanctuary Cities: Local Policies Towards Undocumented Migrants in Los Angeles During Covid-19", August 2, 2025.](#); [Nieri, T., et. al., "Sanctuary city policies and Latinx immigrant mental health in California", December 20, 2022.](#)

<sup>5</sup> [Wong, T. K., et. al., "Fractured Immigration Federalism: How Dissonant Immigration Enforcement Policies Affect Undocumented Immigrants", April 3, 2019.](#); [Ortiz, R., "A Content Analysis of US Sanctuary Immigration Policies: Implications for Research in Social Determinants of Health", July 2021.](#); [Houston, A. R., Salhi, C., and Lincoln A. K., "Messaging inclusion with consequence: U.S. sanctuary cities and immigrant wellbeing", July 22, 2023.](#)

<sup>6</sup> [Houston, A. R., Salhi, C., and Lincoln A. K., "Messaging inclusion with consequence: U.S. sanctuary cities and immigrant wellbeing", July 22, 2023.](#)

<sup>7</sup> [Houston, A. R., et. al., "Challenging federal exclusion: Immigrant safety, health, and healthcare access in sanctuary cities", May 2022.](#)

<sup>8</sup> [FEMA, "National Resilience Guidance: A Collaborative Approach to Building Resilience", August 2024.](#)

<sup>9</sup> [Houston, A. R., Salhi, C., and Lincoln A. K., "Messaging inclusion with consequence: U.S. sanctuary cities and immigrant wellbeing", July 22, 2023.](#); [Fabi, R. and Cervantes, L., "Undocumented Immigrants and COVID-19: A Call for Federally Funded](#)

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[Health Care", September 3, 2021.](#); [Kaiser Family Foundation.](#), "5 Key Facts About Immigrants and Medicaid", February 19, 2025.; [Kaiser Family Foundation](#), "Understanding the U.S. Immigrant Experience: The 2023 KFF/LA Times Survey of Immigrants", September 17, 2023.

<sup>10</sup> Bill 3-22, Legislative Branch – Climate Assessments – Required, Montgomery County Council, Effective date October 24, 2022