

How BIDs use public money to target poor and homeless people.



BIDs, Pigs & Private Security:

How BIDs use public money to target poor and homeless people

Western Regional Advocacy Project

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Executive Summary

BIDs are particular areas, spanning a few to several hundred blocks, in which all property owners pay a special tax or fee to the city, which then turns funds over a private corporation or nonprofit that manages the BID. Most egregiously, BIDs are a driving force behind the privatization and white washing of public space. To defend private property rights, BIDs funnel millions of dollars of public money into private security programs. They also enable corporate actors to collaborate with public agencies to increase police presence and bolster the court systems, with grave impacts on poor and homeless people. Additionally, they lobby for discriminatory laws that criminalize poverty.

Over the past four decades, the BID model has evolved and migrated to cities around the world, with shockingly little public oversight despite the model's emphasis on policing. Such expansion of the police state has serious consequences for poor and homeless people who spend much of their time in public space, and who are disproportionately BIPOC, immigrants and refugees, LGBTQ+, disabled, elders, and young people. Dismantling the structures that allow for the private policing and criminalization of poor and homeless people in public space is particularly urgent in this moment of Black-led demands to defund and abolish police. For instance, in San Francisco, following a small cut to the police budget in 2020, the city awarded a huge grant to the Castro BID for additional security.¹ In other words, rather than defund police, resources were simply shifted from one well known policing entity to another, less well known one. Given the white supremacist origins and ongoing practices of policing in the US, it is crucial to ensure that, as cities divest from their police departments, private policing does not become even more of a go-to solution.

This memo provides an overview of WRAP's ongoing research into BID policing practices, with a focus on three key areas: **private security infrastructure, collaboration with public agencies, and lobbying for discriminatory laws**. Our goal has been to compile precise information about individual BIDs, as well as to synthesize an understanding of BIDs across cities. Ultimately, this research is informing community organizing against the growing privatization of public space and the related criminalization of poor, homeless, and BIPOC communities.

Private security is one of the top priorities for BIDs. In many cases, BIDs spend more of their revenue on security and surveillance than anything else. The main purpose of BID security is to deter or punish so-called "quality of life" offenses — a euphemism for panhandling, sitting, laying down, eating, and other survival activities that homeless people, by definition, must undertake in public space. Referring to themselves as "safety ambassadors," or variations on that

¹ <https://www.sfexaminer.com/news/new-community-ambassadors-to-begin-patrolling-castro-upper-market/>

theme, BID security forces' budgets are often bundled together with cleaning and maintenance. Such euphemisms suggest that BIDs are only spending a portion of the line item budget on policing. But we know that cleaning and maintenance crews actually play a vital role in removing poor and homeless people from public space by performing the “sweeps”— evictions — that destroy personal property and displace individuals and communities. This research shines a light on the behind-the-scenes mechanisms that enable BIDs to actually fund, contract for, and direct their private security forces to exclude poor and homeless individuals from public space.

BIDs also collaborate directly with public agencies, significantly blurring the line between the public and private spheres. They lobby local governments for increased police presence and regularly pay police departments directly for additional on or off-duty uniformed and armed police to patrol their districts, often under the direct supervision and direction of the BID. BID security teams also operate as the “eyes and ears” of local precincts, typically maintaining ongoing radio communication with local officers and in some cases taking orders directly from police supervisors. BIDs also work with city governments to obtain stay-away orders and expedited Trespass Enforcement Agreements that drastically increase poor and homeless people's precarity in public spaces. BIDs fund further extensions of the policing apparatus by financing courts, prosecutors, and community service programs that explicitly target poor and homeless people committing so-called quality of life offenses that are actually “crimes” of survival.

More broadly, BIDs use their economic power to advocate for the enactment, preservation, and strengthening of local and state laws that criminalize poor and homeless people. BIDs lobby directly for discriminatory municipal laws and against various Right to Survive and Right to Rest campaigns in cities across the US. In this way, BIDs expand their geographic reach beyond their precise jurisdictions, constituting an even more outsized influence on policies and practices impacting the lives of those who inhabit public space. Ultimately, it is crucial that those who are concerned about the civil and human rights of poor and homeless people continue to track the ways in which BIDs influence policy while eluding public scrutiny in order to END the criminalization of racialized poverty.

In this memo, we first provide a general overview of BIDs. We then briefly summarize our research methods. The bulk of this memo is then devoted to three sections detailing key ways that BIDs play a role in the policing and criminalization of homeless and poor people: 1) funding increased private security and surveillance, 2) collaborating with public agencies to bolster discriminatory policing, and 3) lobbying for laws that criminalize homelessness. We end with a brief outline of areas in need of further research.

I. BIDs 101

BIDs are bounded areas, spanning a few to several hundred blocks, in which all property owners pay a special tax or fee to the city, which then turns funds over to a private corporation or nonprofit that manages the BID. Although BIDs have only existed in the US since 1976, there are now at least 1,200 BIDs across the country, with new ones forming each year.² One reason BIDs have spread so rapidly is their ability to adapt to local legal and political landscapes. BIDs in different cities have divergent revenue mechanisms, spend money on a variety of programs, market themselves in differing ways, are formed through particular processes, and go by various pseudonyms, such as Community Benefit Districts (CBDs), Green Benefit Districts (GBDs), Property and Business Improvement Districts (PBIDs) and Enhanced Service Districts (ESDs).

Yet, BIDs also share a handful of key, unifying features. First, **the process by which BIDs are formed and dissolved is controlled by and large by the largest property owners within the BID.** According to California BID law, for instance, proponents of a proposed BID must gather signatures from property owners who will pay 50% of the total assessments proposed to be levied.³ Then, ballots are sent out to property owners, and property owners supporting the BID must return more ballots than property owners opposing the BID, with the ballots being weighted according to the size of the ballot caster's property.⁴ In Portland, the formation process for BIDs is much less regulated, and the city council can form a new BID with just a city council resolution. But to dissolve a BID in Portland, property owners representing 33% of total assessments within the district must submit petitions calling for the BID's dissolution.⁵ In other words, there is no way for non-property owners to disband a BID in Portland. Across the spectrum of formation and dissolution processes, property owners are in control, and the more valuable or sizable one's property, the more control one wields. This is a crucial commonality for those who are concerned about the role of BIDs in criminalizing poor and homeless people because BIDs are legally required to spend money according to the budgets that they prepare during the formation process; an entirely undemocratic formation process lays a foundation for an undemocratic way of operating on all levels moving forward.

A second key, unifying feature of BIDs is that **they are funded by revenue collected by local governments.** In Sacramento, the county collects property assessments on behalf of the BIDs, and forwards those funds via the city. The legal consequences for not paying these property assessments are the same as the legal consequences for not paying property taxes, including interest and penalties.⁶ In San Francisco, the Office of the Treasurer Tax Collector is responsible

² Union Square BID Management Plan 2019-2029, p. 19

³ Cal. Sts. & Hwys. Code § 36621

⁴ Cal. Const. art. XIII D § 4(e).

⁵ Portland City Code Chapter 6.06

⁶ Email correspondence on file at WRAP, page 51.

for the levy and collection of assessments.⁷ These assessments, or in some cases fees, are functionally the same as property taxes, except that they go towards a private entity that is only beholden to property owners.

Third, while stated oversight measures for BIDs vary significantly based on local and state laws, **cities generally take a hands-off approach to regulating BIDs.** An audit by the Portland City Auditor, for example, found that “According to the agreements, [The City’s Revenue Division] is to review annual budgets, audits, and scope of services provided. The districts completed the required reports, but Revenue did not collect or review them despite the requirements to do so.”⁸ In California, BIDs are required by state law to file an annual report.⁹ Every BID in San Francisco that was required to submit an annual report for either the 2016-2017 FY or the 2016 calendar year submitted one to the city for review within the 30 day deadline. Yet, not one of the reports made it to the San Francisco Board of Supervisors for review until March 13, 2018, and the Lower Polk CBD annual report was not submitted until October 16, 2018.¹⁰ This lax approach to oversight is a very serious problem with BIDs because, with so much of their government-collected revenue going towards the policing of public space, they have a substantial impact on the lives of people *living* in public space. BID practices have grave consequences for the most marginalized of our cities. As the Portland audit states, “There are established channels in the City for community members to file misconduct complaints about Portland Police officers and have them investigated. There is no equivalent accountable channel for complaints about private security officers.”¹¹

Finally, the main reason that WRAP is concerned with BIDs is that, in cities across the country, WRAP members have observed **more intense policing and displacement of homeless people with greater levels of impunity within BID jurisdictions.** The main purpose of BID security programs, which dominate their budgets, is to deter or punish so-called “quality of life” offenses — a euphemism for panhandling, sitting, laying down, eating, and other survival activities that homeless people, by definition, must undertake in public space. BIDs also collaborate with public agencies to target so-called quality of life offenses, by advocating for increased police presence, operating as the “eyes and ears” of police, pursuing legal avenues to increase poor and homeless people’s precarity in public spaces, such as stay-away orders and expedited Trespass Enforcement Agreements, and funding enable further extensions of the policing apparatus, such as courts, prosecutors, and community service programs. The third prong of BIDs’ efforts to intensify the precarity of poor and homeless people in public space is lobbying for the enactment,

⁷ Memo from Crezia Tano, Manager (OEWD), to Carmen Chu, Assessor-Recorder (S.F. Office of the Assessor-Recorder) 1 (Dec. 9, 2013), on file with WRAP.

⁸ [Enhanced Service Districts: City Provides Little Oversight of Privately Funded Public Services](#)

⁹ Cal. Sts. & Hwys. Code § 36650

¹⁰ San Francisco City Council Resolution No. 401-18

¹¹ [Enhanced Service Districts: City Provides Little Oversight of Privately Funded Public Services](#)

preservation, and strengthening of local and state laws that criminalize poor and homeless people.

These three sets of strategies for increasing the precarity of poor and homeless people in public spaces overlap around the issue of homeless sweeps. Sweeps typically entail police, public works staff, or a BID/city-contracted cleanup crew posting an eviction notice next to an encampment, often in response to complaints or 911 calls. Encampment residents are expected to then dismantle their shelters, pack their belongings, and “move along”. Cleanup crews confiscate anything left in the area. In most cities, crews are required to give a few hours to a few days of notice; often, however, loopholes allow sweeps to occur immediately, with no notice. Sweeps cause people to lose their survival gear and treasured mementos, identification and medicines. They generate citations and fines, causing additional barriers to accessing stable housing. Sweeps push people into highly toxic places and exacerbate health challenges. They are traumatizing, and they exacerbate other forms of violence that disproportionately impact homeless people along lines of race, gender, age, (dis)ability, and so on. In short, sweeps do nothing to address the root causes of homelessness, and instead further entrench racialized poverty. BIDs promote and enable sweeps both systemically and on the ground: many of the laws that BIDs lobby for provide legal grounds for cities to conduct sweeps, which are regularly carried out by BID private security, cleaning staff, and other extensions of the policing apparatus that BIDs advocate for.

Although the BID model itself is a relatively recent phenomenon, BIDs’ policies and practices are nothing new. **Fundamentally, the policing that BIDs enable and intensify is part of the ongoing legacy of white supremacy and classism in the United States**, whereby laws are created to keep specific groups of people out of public space and public consciousness *in order to protect private property and those who own it*. People who were historically targeted by policies like Jim Crow, Sundown towns, Anti-Okie Laws, Operation Wetback, and Ugly Laws *are still* disproportionately harmed by laws on the books in 2021. Housing (in)justice is therefore deeply intersectional: anti-homeless, anti-poor laws today magnify the ways that oppression continues to be stratified along lines of race, class, ethnicity, immigration status, and disability.

Such policing of homelessness and poverty is a manifestation of a white supremacist society. As the recent Black Lives Matter uprisings have highlighted, police violence is part and parcel of structural racism in the US. Homelessness, too, exhibits glaring racial disparities: Black people comprise more than 40% of the US homeless population, while accounting for just 13% of the general population. Although homeless people are criminalized for survival activities across all categories of race, we know that BIPOC, and especially Black and Indigenous people, experience disproportionate, cumulative harm, and do so in intersecting ways along lines of race, gender, (dis)ability, etc. That Black and Indigenous people are impacted more intensively than any other group is no coincidence. Racist policing contributes to precarious housing in myriad ways, serving to uphold a centuries-old property rights system that is inherently white

supremacist. In turn, living unsheltered disproportionately exposes people to a system of policing that targets poor and homeless people.¹²

A recent manifestation of oppressive policies and practices, the BID model serves to strengthen the power imbalance between corporations and property owners, on the one hand, and tenants and homeless people, on the other. Although there are many differences between BIDs across city and state boundaries, they share core characteristics, especially with regard to the ways in which property owners have an outsized say in BID formation and dissolution, the ways in which BID revenue mechanisms enable public money to be funnelled to corporate entities, a lack of oversight and accountability measures, and the role of BIDs on the violent displacement of unhoused people--within and beyond the boundaries of BIDs. Essentially, BIDs use publicly collected funds to privately police public space and those who inhabit it, with dire consequences for poor and unhoused people. They function to remove visible signs of poverty from public space and warp collective understandings of the public good.

II. Research Methodology

WRAP member groups have been alarmed about the role of BIDs in policing urban space for fifteen years. WRAP was founded in 2005 by local social justice organizations in the western US, with a mission to expose and eliminate the root causes of homelessness and poverty, empower communities to demand protection of civil and human rights, and advocate for restoration of federal funding for affordable housing. Today, WRAP is composed of homeless-led and accountable organizations in ten cities (and counting) across the country, united in an effort to stop the sweeps of homeless and poor people.

In 2018, WRAP collaborated with the UC Berkeley Policy Advocacy Clinic to produce a report on CA BID lobbying practices. The report affirms that BIDs spend a significant amount of property assessment revenue, including income from publicly owned properties, on anti-homeless policy advocacy more broadly, beyond the bounds of BIDs themselves. The report further illuminates a strong correlation between the growth in the number of BIDs and a rise in laws targeting homeless people in California, even outside of BIDs. It concludes that BIDs' policy advocacy efforts to promulgate cruel limitations on survival activities go hand-in-hand with the growing prevalence of anti-homeless laws. Such advocacy efforts are orchestrated by policy and government-relations specialists and registered lobbyists, whose salaries are paid by BIDs—and therefore with government-collected assessments.

Since the publication of the Berkeley report and additional in-depth research in California, WRAP has undertaken comprehensive action research in several additional cities in order to

¹² [Without Housing Homeless Bill of Rights Campaign Presentation, Western Regional Advocacy Project; A Brief Timeline of Race and Homelessness in America](#)

understand the inner workings of BIDs and their role in violating the rights of poor and unhoused people. To our knowledge, no communities have successfully challenged the BID model of policing in any overarching way. We therefore ask: *How do land use laws and governance of public space practices combine to disproportionately impact homeless people? What is the role of publicly funded privatized policing, via Business Improvement Districts (BIDs), in criminalizing homeless people? What are the bureaucratic and (extra-)legal mechanisms by which governments simultaneously bolster the power of property owners and intensify the precariousness of racialized poor people? Where might such practices be susceptible to challenges from below?*

University and movement scholars have long contextualized BIDs and the protection of private property in larger processes of racial capitalism and settler colonialism (e.g., see Mitchell and Staeheli, 2006)¹³. Yet, in order to successfully challenge BIDs and the city governments that enable their practices, it is necessary to understand much more about their nuanced inner-workings, including the legal and bureaucratic technicalities of their budgeting processes, oversight and accountability mechanisms (or lack thereof), fee assessment formulas, sweeps practices, and especially their police and private security firm contracts and practices.

From 2019-2021, WRAP has therefore convened local teams of community and university researchers investigating BIDs in their own cities. To help local teams get started, we created a BID Research Toolkit, consisting of a Step-By-Step Guide to BID Research, an empirical research question template, and a shared google folder system for uploading and organizing documents. Teams have obtained, organized, and analyzed public documents, with a focus on BID formation processes, funding mechanisms, oversight measures, and security/policing practices, for eight cities and counting: Berkeley, Denver, Los Angeles, New York, Oakland, Portland, Sacramento, San Francisco. Crucially, each team is closely connected to WRAP's local core member groups, ensuring accountability to local organizing and providing an opportunity for grassroots groups to be involved in—and act upon—the research.

In the sections that follow, we outline our findings focused on BID policing structures and functions.

¹³ Mitchell, D. and Staeheli, L. (2006) Clean and safe? Property redevelopment, public space, and homelessness in downtown San Diego. In S. Low and N. Smith (eds), *The Politics of Public Space*. New York: Routledge, 123-142.

III. BIDs Police Through Private Security

Funding and operating private security forces is a top priority for nearly all BIDs that WRAP has studied. In many cases, **BIDs spend over half of their overall revenue on private security and policing.** The staff of these fleets go by various pseudonyms, including “ambassadors,” “service representatives” or “officers”, and are employed and managed by the BID itself or by private contractors, such as Allied Universal, Block by Block, or Paladin Security. In all cases, these security teams are deployed to target so-called quality of life crimes and harass poor and homeless communities. Some of these security personnel are armed and others have used “citizens arrest” to physically detain homeless individuals who refuse their orders.¹⁴ Many BIDs combine the budgets for security programs with the budgets for cleaning programs. Although cleaning programs use different tactics and rhetoric than security programs, they share the same core function: removing visible signs of poverty from public space by harassing poor and homeless people. One WRAP organizer describes the cleanup postings commonly nailed to telephone poles by so-called cleanup crews and safety ambassadors as simultaneously “judge, jury, and executioner.” The cleanup notice, itself, in other words, by declaring an area off-limits to camping so that cleanup crews can haul away people’s possessions and power wash the sidewalk, achieves the same ends as actual policing.

At a time when people across the country are calling for police budgets to be cut and police involvement in communities to be walked back, such private security forces exist as a relatively easy and unaccountable alternative for BIDs to continue discriminatory policing in their areas.¹⁵ This section focuses on private security and cleaning programs that respond solely to BIDs and avoid government oversight, with a focus on how these programs target poor, BIPOC, and homeless people. In later sections we will see that private security and cleaning crews do not work alone and that BIDs collaborate with public agencies, including police departments, to further increase the criminalization of homelessness.

BIDs Prioritize Funding For Private Security Forces

Most BIDs, especially those that have large budgets and/or are located in gentrifying areas, spend exorbitant amounts of money on private security. In fact, these BIDs typically spend more on security than almost anything else— second only to cleaning, for those budgets that actually parse the two out. As noted above, cleaning is nearly always a euphemism for policing, and essentially constitutes a second, shadow budget line dedicated to criminalizing poverty.

Where uncertainty exists as to the goals of a project, the numbers don’t lie: an analysis of how

¹⁴ Andrews Int’l Private Sec., Arrest Report, Booking No. 4508650 (Nov. 23, 2015).

¹⁵ See for example [this article](#) about the rise of armed security officers in Sacramento.

BIDs are funding and directing their private security teams illustrates how central policing is to the BID ethos.

In **Austin**, the Downtown Alliance PBID will spend more than \$4.2 Million on “safety and hospitality” in 2020-2021 – accounting for over 41% of their total budget.¹⁶ Though the specific break-down of that category is not made public, we know that the money is used to fund forty-eight security “ambassadors” from Block by Block (BBB), *in addition to* two off-duty Austin Police officers who patrol the BID twelve hours a day, seven days a week.¹⁷ The South Congress PBID will spend 25% of its total 2020-2021 budget – that’s \$74,700 – on “public safety,” which includes a contract for BBB “ambassadors.”¹⁸ The East Sixth St. PBID claims to spend only \$27,000 (20% of its total budget) on safety. Part of its “Infrastructure / Physical Environment” budget, however, goes towards “[exploring] methods of tactical urbanism to increase safety at a low cost to the City.”¹⁹ Given that “tactical urbanism” often includes anti-homeless design strategies, such as installing boulders in areas frequently used as camping sites and decorative metal spikes that inhibit laying down on benches, this line-item suggests that the BID is spending even more resources on policing poor and homeless folks than its “safety” budget implies.

In **Chico**, the Downtown Chico BID has dedicated the vast majority of its total budget – 87% (\$400,000) – to its “clean and safe” program.²⁰ While publicly available information doesn’t show how much of that is specifically funnelled towards security, the BID funds five full-time security “ambassadors” to patrol the area twenty-two hours a day, seven days a week.²¹ Given California minimum wage laws²², this means that the BID will spend *at least* \$135,200 (29.5% of its total budget) on wages alone for those five full time “ambassadors” in 2020.

In **Denver**, the Downtown Denver Partnership will spend over \$900,000 on security in 2020 as part of its collaboration with the City and the Denver Police Department (DPD) on the “Security Action Plan.”²³ This money will fund Allied Security officers to patrol the BID 24 hours a day, 7 days a week,²⁴ as well as provide \$25,000 in funding for the DPD’s ShotSpot surveillance technology.²⁵ The Cherry Creek BID dedicates over \$1.4 Million (35% of its total budget) on “physical environment.” While only \$30,000 of that budget is specifically dedicated to “safety”, lines for “professional services” (\$40,000), and employee salaries/benefits/taxes (\$453,000) may

¹⁶ <https://www.austintexas.gov/edims/document.cfm?id=325410> p. 2

¹⁷ <http://blockbyblock.com/program/downtown-austin>; <https://downtownaustin.com/what-we-do/our-services/>

¹⁸ <https://www.austintexas.gov/edims/document.cfm?id=323945> p.1, 4

¹⁹ <https://www.austintexas.gov/edims/document.cfm?id=325408> p.2-3

²⁰ [Downtown Chico Management Plan](#), p.7, 14

²¹ [Downtown Chico Management Plan](#), p.13

²² <https://www.minimum-wage.org/california>

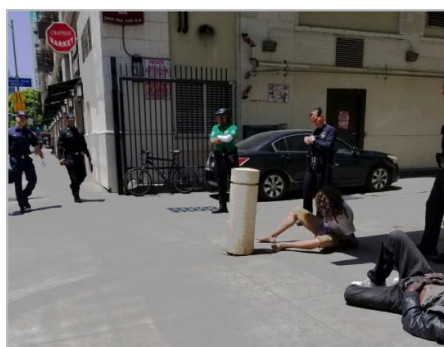
²³ [2020 Downtown Denver Operating Plan](#) at p.25

²⁴ <https://www.downtowndenver.com/newsroom/private-security-team-begins-role/>

²⁵ [2020 Downtown Denver Operating Plan](#) at p.17

also be used to fund security to some degree.²⁶ Moreover, the BID has collaborated with the DPD to establish an extensive volunteer safety ambassador program to bolster paid security measures via its “community watch” program. Other Denver BIDs obscure their security funding further: the Colfax BID has no budget line dedicated to security, but Board meeting minutes show that it has an active “security committee,”²⁷ while the Five Points BID also has no security budget but does have a safety plan that outlines the use of private security and “block captains” – funding for which must come from somewhere.²⁸

In **Los Angeles**, the Hollywood Partnership BID spends nearly 50% of its total budget - over \$3.5 million dollars in 2019 - on private security alone, which it contracts through AGS, Inc.²⁹ These private security guards are primarily off-duty or retired law enforcement officers, and they collectively patrol an average of fourteen hours per day.³⁰ The Fashion District, Arts District, and Downtown Center BIDs all contract with Allied Universal for security to patrol by foot, bike, and vehicle twenty-four hours a day, seven days a week.³¹ In 2020, the Fashion District will spend \$1,482,861 (27% of its total budget) for this security fleet, while the Downtown Center BID spent \$2,128,923 for these services in 2019 (or 29.3% of its total budget).³² While most other Los Angeles BIDs obscure their actual security spending by bundling “clean and safe” budgets, the importance they place on BID security is illustrated by different numbers: for example, while the Figueroa Corridor BID does not provide recent data on their security team, information from 2013-2014 shows the BID contracted with Securitas, Inc. for fourteen security officers to patrol the BID’s nineteen blocks for a total of 29,000 hours in 2013 (79 hrs/day). Similarly, the Historic Core BID contracts with Street Plus for officers to patrol the BID’s twelve



A security “ambassador” for the Historic Core BID stands by while LAPD officers surround two individuals sitting/lying on the sidewalk.

blocks twenty-four hours a day, clocking a total of 23,000 hours (69.5 hrs/day) in 2019.³³ In the Downtown Industrial District BID, the breakdown of “clean and safe” spending (over \$1.5 million in 2020) is even more obscured, given the BID’s focus on targeting Skid Row residents³⁴ and the shared role that security and cleaning crews play in sweeps.

In **New York City**, the 2019 NYC BID Trend Report found that BIDs collectively spent \$25.1 million dollars on “public safety” in 2019. For thirty-six BIDs, this money funded their

²⁶ [2019 Cherry Creek Operating Plan](#) at p.6-9

²⁷ [2019 Colfax Operating Plan](#) (search “safety committee”)

²⁸ [2019 Five Points Operating Plan](#) (search “safety”)

²⁹ <http://onlyinhollywood.org/hollywood-bid/safe>

³⁰ <http://onlyinhollywood.org/hollywood-bid/safe/>

³¹ See <https://fashiondistrict.org/about/clean-and-safe>; <https://artsdistrictla.org/about/bid-overview/>; and the [Downtown Center Management Plan](#) at p.14

³² https://fashiondistrict.org/files/docs/2020-budget_web.pdf and [Downtown Center 2019 annual report](#) p.31-32

³³ 23,000 hour total based on the numbers from March, June, September and December Safety Reports, found [here](#).

³⁴ See this [BID new bulletin](#) from 2019

own private security forces which collectively logged 660,000 total hours across 337 officers in 2019.³⁵ This “public safety” spending also included video surveillance programs and canine patrols that conducted “regular security checks.”³⁶ Several BIDs directly hired NYPD officers through the Paid Detail Unit to increase armed patrol of their districts, although it is not clear if the Trend Report numbers include the hours logged by and money spent on these officers. If not, then the numbers are likely much higher than the Trend Report suggests. Regardless, the budgets of NYC’s 10 largest BIDs accounts for at least \$17 million of that \$25.1 million grand total.³⁷ The Diamond district, for example, spent 44% of its total budget on private security in 2017.³⁸ The Garment District spent 36% of its total 2019 budget (over \$2.7 million) on twenty-two private security guards to patrol the BID seven days a week.³⁹ The Grand Central Partnership BID spent over \$2.8 million (20% of its total budget) on “public safety” in 2019, including its own fleet of in-house, licensed security officers.⁴⁰ The Times Square Alliance BID spent over \$3.8 million on “public safety” in 2019 (17% of its total budget), and will increase its safety spending to 21% of the total budget in 2020.⁴¹

In **Oakland**, the city’s largest BIDs have developed substantial security teams, contracting with companies like BBB, Peralta Service Corporation, and Bay Alarm. While these BIDs consistently bundle security and cleaning budgets, somewhat obscuring how much money is actually being spent to police the area, we know that cleaning often performs the same function as security: it rids public space of people with nowhere else to go. For instance, The Unity Council (which oversees the Fruitvale BID) spent over \$1.6 million in 2019 a contract with Peralta for “maintenance, landscaping, and [safety ambassadors]”.⁴² There is no public-facing information about how that money was distributed, however, nor on how much of it came from BID assessments. The Downtown/Lake Merritt CBD (also called Downtown/Uptown) budgeted \$1.9 million for 52,832 hours of “street ambassador” services in 2019 to provide “cleaning, safety, and hospitality.”⁴³ While the BID does not specify how those 52,832 hours are distributed, it contracts security officers through BBB, which claims to provide twenty-five officers specifically for “safety” and “hospitality” services (as opposed to “environmental maintenance”).⁴⁴ The Jack London BID contracts with BBB for seven “safety” and “environmental management” officers, but does not specify how the over \$600,000 budgeted for “Maintenance, Beautification, Safety & Streetscape Improvements” in 2019 was distributed

³⁵ <https://www1.nyc.gov/assets/sbs/downloads/pdf/neighborhoods/fy19-bid-trends-report.pdf> p.42

³⁶ <https://www.timessquarenyc.org/about-the-alliance/public-safety-sanitation>

³⁷ See [NYC BIDs spreadsheet](#)

³⁸ See [47th Street/Diamond District 2019 comptroller audit](#)

³⁹ [47th Street/Diamond District 2019 comptroller audit](#); [2019-2020 Garment District financials](#) p.3

⁴⁰ [Grand Central Partnership 2019 Financial statements](#), p.5; <https://www.grandcentralpartnership.nyc/about/careers>

⁴¹ [Times Square Alliance 2019 Financial statements](#), p. 5; [2020 Annual Report](#), p. 18

⁴² <https://unitycouncil.org/wp-content/uploads/2020/05/SSUC-Audit-09.30.19.pdf> at p. 7, 10.

⁴³ [Downtown / Lake Merritt 2019 Annual report](#), p. 7

⁴⁴ <http://blockbyblock.com/program/downtown-oakland>

between these services.⁴⁵ Beyond security officers themselves, Oakland's BIDs also spend publicly collected funds on surveillance programs that include license plate recognition technology, security cameras, and Crime Prevention Through Environmental Design (CPTED) programs.⁴⁶

In **Philadelphia**, the Center City BID will spend over \$4 million in 2020 on "public safety."⁴⁷ This includes a fleet of **52** in-house security guards, called "Community Service Representatives (CSRs)," who patrol the district 7-days a week.⁴⁸ Port Richmond Industrial Development District dedicates more money to security than almost *all* other expenses combined: with about 45% of its total budget dedicated to uniformed security officers and another 3-4% dedicated to installation and operation of security cameras.⁴⁹ The Aramingo BID does not publicize its finances, but has contracted with Allied Barton for private security to patrol the district.⁵⁰ The City Avenue BID will spend 35% of its total budget (\$575,234) on "public safety" in 2020, including a fleet of eight officers to patrol the District on bicycle and segway six days a week.⁵¹



Portland's Downtown Clean & Safe ESD hires a fleet of both armed and unarmed Portland Patrol Inc. officers to patrol the BID 7 days a week

In **Portland**, BIDs (referred to as Enhanced Service Districts, or ESDs) offer very little public information about their spending or management practices. However, information obtained via a public records request sheds some light on these practices. For example, the city's largest BID - the Downtown Clean and Safe ESD - allocates nearly half of its total budget on security. In 2017, Clean and Safe officially spent over \$1.9 million on "security", including a fleet of private security officers contracted through Portland Patrol Inc.⁵² This fleet, many of whom are armed former police officers, dispatched around fourteen officers over sixteen hours a day, seven days a week, to patrol the BID on foot and bicycle.⁵³ The \$1.9 million was also used to fund four Portland Police officers to patrol the BID.⁵⁴ The BID also spent \$164,296 in 2017 on a fleet of "street ambassadors" who, while not part of the "security" budget, function as street-level

⁴⁵ <http://blockbyblock.com/program/jack-london>

⁴⁶ [Laurel District BID 2019 Annual Report](#), p.2; [Jack London 2019 Annual report](#), p.3; [Montclair 2020 Annual report](#), p.4

⁴⁷ [2018-2022 Center City BID budget](#), p. 8

⁴⁸ [2018-2022 Center City BID budget](#), p. 3

⁴⁹ [2017 Report Of the City on the Port Richmond Industrial District](#), p.12

⁵⁰ <http://aramingoba.org/about-kaba/the-crews/>

⁵¹ [2013-2018 City Ave Impact Report](#), p.14-15

⁵² [2016 Agreement for Clean & Safe District Management Services](#) p.35; <https://downtownportland.org/programs/>

⁵³ Calculation of all hours and officers (including supervisors) discussed in: [2016 Agreement for Clean & Safe District Management Services](#) p. 23-25

⁵⁴ *Id.*

surveillance for the security team.⁵⁵ These ambassadors are considered the “front line” of the Clean and Safe program, and are specifically tasked to “serve as the eyes and ears for all District community policing efforts,” and to use their radios to “immediately arrange for dispatch of security and/or maintenance personnel when needed.”⁵⁶ As such, it is more accurate to say that Downtown Clean and Safe spent nearly \$2.1 million on security in 2017 – 48% of its total budget.

In **Sacramento**, the Stockton Blvd. BID spent 33% of its total budget on “security and safety” in 2019, which includes a contract with California Patrol Operations (CPO) officers to patrol the district for an average of 70 hrs/week.⁵⁷ These CPO officers are uniformed (and sometimes armed) to look like city police, and even have a fleet of marked “patrol” vehicles. Aside from Stockton Blvd, most other Sacramento BIDs bundle their security budgets with cleaning and/or maintenance, making it difficult to parse out just how much money is being dedicated to security. On average, these BIDs direct around 48% of their budgets to these bundled clean and safe programs, suggesting significant funding may be available for private security measures.⁵⁸ It is also clear from the available research that these BIDs are using that money on private security: for example, the Midtown BID reports 8,000 hours of “safety ambassador” patrols,⁵⁹ while several BIDs report contracting with private security such as Sacramento Protective Services and Paladin Security (whose officers are **armed**).⁶⁰ Moreover, several Sacramento BIDs also have very close working relationships with the Sacramento Police Department (SPD), and may need less privately funded security to police their BIDs.

In **San Francisco**, the East Cut Community Benefit District spent \$892,707.00 on “Public Safety” in 2019, which was 34% of total annual expenses. This includes funding for a 24/7 private security program.⁶¹ The Yerba Buena Community Benefit District spent \$1,234,552 on “Security and Safety” in 2019, which was 41% of total expenses. This includes funding for a San Francisco Police Department officer dedicated solely to the district working 12 hours per day.⁶² The Union Square BID spent \$2,733,945 on “Clean



California Patrol Operations officers pictured in the Stockton Blvd. BID

⁵⁵ [2016 Agreement for Clean & Safe District Management Services](#) p. 35

⁵⁶ [2016 Agreement for Clean & Safe District Management Services](#) p. 27

⁵⁷ [Stockton Blvd. 2019 Annual Report](#), p.10-11

⁵⁸ Based on an averaging of the budgets available in the [Sacramento Research toolkit](#). Note that some of those budgets are older than others, and so 48% is a rough average.

⁵⁹ [Midtown BID 2018 Annual Report](#), p.6

⁶⁰ <https://dpbpartnership.com/services>; <http://mackroadpartnership.com/our-services/clean-safe/>

⁶¹ [The East Cut CBD Annual Report 2018-2019](#)

⁶² [Yerba Buena CBD Annual Report 2018-2019](#)

and Safe” in 2019, which was 67% of total expenses. This includes funding for overnight security patrols, two San Francisco Police Department officers dedicated solely to the district working 10 hours per day each, and overnight supervision for the more than 300 surveillance cameras that the USBID has installed in the district. These examples are reflective of average BID activity in San Francisco. In total, fourteen BIDs in the city spent an estimated \$13,360,287.50 out of \$23,636,119.45 on private security in FY 2019. This does not include the SoMa West Community Benefit District, which began operation in 2020, and devoted \$3,129,103.00 out of its \$3,965,915.00 budget to its “Clean, Safe and Beautiful” program.⁶³

In **Santa Rosa**, the two relatively-new BIDs (locally called Community Benefits Districts, or CBDs) are growing their security teams. The Downtown Santa Rosa CBD spent 66% of its total budget in 2019 (\$350,000) on its “Sidewalk Operations/Civil Sidewalks” program - essentially a “clean and safe” program that bundles security and cleaning costs.⁶⁴ The spending included over \$250,000 on services contracted from Street Plus, a niche company that provides cleaning and security services directly to BIDs. Street Plus security “ambassadors” patrol on foot, Segway, and by car.⁶⁵ While it is not clear exactly how the *Sidewalks* money was distributed, documents show it was intended to go towards hiring private security and/or Santa Rosa Police patrols.⁶⁶ The city’s other BID, the Railroad Square CBD, dedicated 68% of its 2020 budget (\$160,000) to its twin “Civil Sidewalks” program, and does not distinguish between security or cleaning costs.⁶⁷ WRAP has not yet uncovered information as to if or how Railroad Square finances private security patrols.

BID Security Targets Poor, BIPOC, And Homeless Folks Through “Quality Of Life” Patrolling

While the funding and form of private security varies across BIDs, every BID that WRAP has studied focuses its security forces on “quality of life” policing which targets and criminalizes street vendors, buskers, and poor and homeless people for basic survival activities such as sitting, lying down, sleeping, and panhandling. According to a survey published by Berkeley Law in 2018, over 80% of California BIDs identified “panhandling and loitering” as “one of the most important issues that the BID has faced in terms of safety and security.”⁶⁸ Several BIDs contract with Block by Block (BBB) for their security (and cleaning) personnel. BBB directs it’s safety “ambassadors” to address low level quality of life crimes,⁶⁹ and includes

⁶³ [SoMa West Community Benefit District Management District Plan](#)

⁶⁴ [Downtown Santa Rosa CBD 2018 Management Plan](#), p.5; [Annual Meeting Minutes 01/15/2020](#), p.7

⁶⁵ <https://www.streetplus.net/safety>

⁶⁶ Id.

⁶⁷ [Railroad Square 2019 Management Plan](#), p.6

⁶⁸ [Homeless Exclusion Districts](#), p.9

⁶⁹ See for example <http://blockbyblock.com/program/downtown-oakland>

a tip sheet called “How To Say ‘No’ To A Panhandler” on their website.⁷⁰ In at least one account, BBB identified “the visible presence of homeless persons and those persons involved in quality of life issues” as the most pressing issue affecting a BID it services.⁷¹ BBB also gained notoriety this past year when video footage was circulated of two of its ambassadors beating up an unarmed homeless individual in a downtown alley in Berkeley.⁷²

BBB is certainly not the only security force with these priorities: **Austin’s** East Sixth street BID security team is directed to: “continue addressing homeless services and related safety issues” and “reduce panhandling and other quality of life issues affecting the district.”⁷³ **Chico’s** Downtown BID expects their safety “ambassadors” to “gather information on incidents or criminal activity such as public intoxication, open container, loitering, trespassing, public urination, aggressive panhandling, etc.,” and also “monitor panhandling and other antisocial behavior.”⁷⁴ **Oakland’s** Fruitvale BID directs it’s officers to “[report] and/or resolve instances of nuisance activity (panhandling, open container violations, etc.) in the district.”⁷⁵ Downtown Denver Partnership security is directed to “to work with police to target “unlawful and nuisance” activity, including “quality of life issues.”⁷⁶ According to the Downtown Sacramento BID’s 2018 management plan, part of the “benefits” of sidewalk operations include private security to “respond to homeless issues, aggressive panhandling and mentally ill people behaving poorly in the public rights of way.”⁷⁷ **Los Angeles** BIDs direct their security officers to “deter such illegal activities as public urination, indecent exposure, trespassing, drinking in public, prostitution, illegal panhandling, illegal vending, and illegal dumping.”⁷⁸ Meanwhile, in June 2020, *in the height of the COVID-19 pandemic*, the Downtown Santa Rosa BID’s Board of Directors collaborated with the Historic Railroad Square BID to harass and displace tent encampments that had formed after the outbreak of the virus. In Board meeting minutes, members discussed unsuccessful attempts to lobby City Council to disperse the encampments, as well as measures taken by hired Street Plus security officers, specifically tasked to target homeless individuals living in the district.⁷⁹

⁷⁰ <http://blockbyblock.com/blog/how-to-say-no-to-panhandlers>

⁷¹ [Homeless Exclusion Districts](#), p.12

⁷² [Whose Streets? Houselessness in the Age of Business Improvement Districts](#); see also the [video footage here](#)

⁷³ [East 6th 5 year service plan](#), p.9

⁷⁴ <http://www.chicopbid.com/services/>; see also: https://chico-ca.granicus.com/MetaViewer.php?view_id=2&clip_id=673&meta_id=54847 p. 12

⁷⁵ [Peralta SNAP Job Description](#)

⁷⁶ [2020 Downtown Denver preliminary budget and operating plan](#), p.17, see also: <https://www.downtowndenver.com/newsroom/private-security-team-begins-role/>

⁷⁷ [Downtown Sacramento BID’s 2018 management plan](#) p.5

⁷⁸ See: [Downtown Center Management Plan](#) at p.14; [Arts District Management Plan](#) at p.11; [Downtown Industrial Management Plan](#) at p.11; the [Figueroa Corridor Management plan](#) at p.12; and the [Fashion District Management Plan](#) at p.12

⁷⁹ See [June 2020 Downtown Action Organization Board minutes](#), p.4 and [May 2020 Railroad Square Association Board Minutes](#), p.1-2

BID security uses various tactics to engage in this “quality of life policing.” “CSRs” in **Philadelphia**’s Center City BID use tablets to track “quality of life” and code violations in real time. This information is shared with “20 responsible public and private agencies in Philadelphia”, including the Philadelphia Police department.⁸⁰ Clean and Safe Portland’s “Report a Problem” webpage lists the following as issues to contact security officers about: disorderly behavior, aggressive panhandling, public drinking, and individuals sleeping in doorways or blocking access.⁸¹ The Times Square BID in **New York** has a website that provides an email address (StreetWatch@TSq.org) for anyone who has a concern about a “quality of life” issue in the BID, which goes directly to the BID security dispatcher. The website lists examples of what should be reported, including “aggressive panhandling” and “illegal vendors.”⁸² Moreover, WRAP is aware of at least one instance where security officers from **Los Angeles**’ Hollywood Entertainment District have used a “citizen’s arrest” to handcuff and detain a homeless individual for refusing to move from sitting on the sidewalk.⁸³



A security ambassador in the Jack London BID removing someone's sleeping bag while they don't appear to be present

In **Oakland**, the Downtown/Lake Merritt BIDs require security “ambassadors” to log panhandlers in a “Known Persons Database,” and used the database to target and harass five specific individuals in 2015.⁸⁴ In 2018, **New York**’s Garment District BID successfully lobbied the City Council to remove infrastructure that the BID characterized as “magnets for antisocial behavior.”⁸⁵ The Sacramento Downtown BID’s security officers reported “about 200 proactive interactions with the homeless population each month” in 2019.⁸⁶ **Los Angeles**’s Figueroa Corridor BID’s website lists under “accomplishments” the fact that the security team made 3,858 “contacts” with “transients” and 179 “contacts” with illegal vendors in 2013.⁸⁷ Similarly, an analysis of the “Safety Reports” put out by the Historic Core BID shows that security officers reported the following infractions in 2019: 2297 blocking sidewalks; 406 encampments; 78 aggressive panhandling; 458 passive panhandling.⁸⁸ Importantly, “blocking sidewalks” was consistently reported at a higher rate than any of the other statistics except for “wellness checks”

⁸⁰ <https://www.centercityphila.org/ccd-services/public-safety/crime-prevention>; also [2017 Center City Budget](#), p.3

⁸¹ <https://downtownportland.org/report-a-problem/>

⁸² <https://www.timessquarenyc.org/about-the-alliance/public-safety-sanitation>

⁸³ See [Homeless Exclusion Districts](#), p. 11, citing Andrews Int’l Private Sec., Arrest Report, Booking No. 4508650 (Nov. 23, 2015).

⁸⁴ [Homeless Exclusion Districts](#), p. 10

⁸⁵ [2018 Garment District Annual Report](#), p.20

⁸⁶ [Downtown Action Org. Board Meeting, October 2019](#), p.2

⁸⁷ <https://www.figueroacorridor.org/who>

⁸⁸ Based on calculating the total numbers from March, June, September, and December 2019 reports, see <https://historiccore.bid/reports/>

(3093 total) - where officers question individuals that appear homeless - and “business checks.”⁸⁹ Over a five-month period in 2019 alone, **Denver**’s Downtown Denver BID security reported responding to the following incidents: 2130 sit and lie, 1847 trespass, 721 unauthorized camping, and 2285 “welfare” checks.⁹⁰ Moreover, the Downtown BID has collaborated with the City and Denver Police department to craft expedited trespass agreements and stay-away orders that greatly increase the ability to enforce these discriminatory laws.

BID “Cleaning” Programs Target Poor & Homeless People

One of the most common types of programs for BIDs is street cleaning and maintenance. These programs nominally create clean streets by removing trash and graffiti. Yet, they are guided by the same goal as security programs: remove any visible signs of poverty from public space. BID street cleaners displace poor and homeless people from public spaces by threatening them with police intervention and destruction of their property if they refuse to move along. In an email to a **San Francisco** Police Department captain, the executive director of the Mid Market Community Benefit District (MMCBD) said “The CBD knows that for our Ambassadors and Cleaners to be adequately supported in hot spots (so they can actually do their job of cleaning and hospitality) we need our own 10B.”⁹¹ The 10B program, discussed further in section IV, allows BIDs to rent out police. The cleaners need a reliable police response in order to do their job of removing poor and homeless people from public spaces.

In 2014, the Legal Aid Foundation of **Los Angeles** filed a lawsuit on behalf of Los Angeles Catholic Worker, a service provider in Skid Row, and LACAN, a grassroots organizing group in Skid Row, against the Los Angeles Downtown Industrial District BID, its managing organization, and the city of Los Angeles. The lawsuit stated that the BID was violating the 4th and 14th amendment rights of homeless people by seizing their unabandoned property and that the city enabled it by alerting the BID where homeless people’s property was left unattended and standing guard as it was seized.⁹² Although the BID claimed that their actions were part of a sidewalk cleaning program, BID officers took property that created no health or safety risk. They took the property without providing notice to the owners and with the explicit intent of making life more difficult for homeless people within the BID’s boundaries.⁹³ In 2017, the Los Angeles City Council approved a settlement, agreed to stop the illegal seizure of homeless people’s unattended belongings, and paid \$25,000 to the Legal Aid Foundation of L.A.⁹⁴ This is a prime example of how public health and sanitation rhetoric is used by BIDs to cover up programs that function primarily to displace homeless people by illegally stealing their property.

⁸⁹ <https://historiccore.bid/reports/>

⁹⁰ [2020 Downtown Denver preliminary budget and operating plan](#), p.57

⁹¹ Emails on file with WRAP. (Police Response 1)

⁹² [Los Angeles Catholic Worker et al v LA Downtown Industrial District Business Improvement District et al](#)

⁹³ [Los Angeles Catholic Worker et al v LA Downtown Industrial District Business Improvement District et al](#)

⁹⁴ [City, Business Group Settle Suit Over Seizure of Homeless People’s Property, Los Angeles Downtown News](#)

IV. BIDs Collaborate Directly With Public Agencies To Bolster Discriminatory Policing

One of the most concerning aspects of BIDs is the direct working relationship that many have with public agencies, including local police departments. These relationships are used to increase the number of cops on the ground in BIDs, increase communication and collaboration between private security and local precincts, increase the punishments for quality of life crimes, and build out the security apparatus through investments in courts, prosecutors, and punitive community service programs. Strategies for increasing police presence and collaboration with private security involve several prongs: negotiating to change or increase local police beats, directly hiring on or off-duty police to patrol districts, and shaping private security to act as the “eyes and ears” of local police, so as to expedite enforcement of “quality of life” violations. In any case, these close working relationships between BIDs and police are fundamental to the BID project nationally: for example, in a 2017 survey of California BIDs conducted by UC Berkeley, over 90% of respondents confirmed that they work with local police to enforce laws.⁹⁵ This section covers the ways in which BIDs work to change public agencies’ policing priorities to increase the criminalization of poor and homeless people within their borders, how private security and cleaning programs collaborate with police departments to maximize the policing of public space, and how BID revenue is used to fund infrastructure for handling increases in citations and arrests that are caused by increases in criminalization and policing.

BIDs Negotiate With Local Police And Government To Increase Police Presence

One tactic BIDs use when working with local government is to push for additional police officers in their districts. This can take the form of rearranging existing police beats to direct more officers into the BID area, adding new beats (and new officers), or creating extra policing initiatives beyond regular beats. The Downtown Chico Business Association partnered with the Chico Police Department to form the Clean and Safe Action Group, which successfully lobbied for increased police staffing in the district to address “rising concerns about panhandling, aggressive behavior, loitering, vandalism, and camping.”⁹⁶ **San Francisco**’s Union Square BID lobbied for more police officers to enforce anti-homeless laws and received a \$3 million grant from the Silicon Valley Community Foundation “to increase police patrols during the holidays and to install security cameras.”⁹⁷ In 2015, **Sacramento**’s North Franklin PBID successfully lobbied the Sacramento Police Department to add an additional beat within its boundaries.⁹⁸ In **Santa Rosa**, the Downtown BID collaborated with the City and the Santa Rosa Police Department

⁹⁵ From [Homeless Exclusion Districts](#), p.9

⁹⁶ [Homeless Exclusion Districts](#), p. 10

⁹⁷ [Homeless Exclusion Districts](#), p. 10

⁹⁸ [Homeless Exclusion Districts](#), p. 11

on the “Downtown Action Plan” which includes “increased police presence and response” in the BID.⁹⁹

Other BIDs have lobbied for special units to operate in their BIDs beyond regular police beats. In **Oakland**, the Downtown/Lake Merritt BID successfully advocated for the deployment of a new police “Metro Unit” that works in partnership with the BID’s Ambassador Program and its Community Watch Program.¹⁰⁰ **Denver**’s Colfax BID Works directly with the Denver Police Department to increase police presence in the BID through “Operation Pearl” - an initiative that increases police presence at the specific corner of Pearl and Pennsylvania.¹⁰¹ In 2019, the BID’s Security Committee also set the goal of working with the DPD to increase walking beat cops in the BID more generally.¹⁰²

The Union Square BID also advocated strongly for the 2019-2020 city budget to include the Union Square Ambassador Program, which commits \$350,000 from the San Francisco general fund to pay seven retired cops to patrol Union Square.¹⁰³

One particularly blatant example of this collaboration can be seen in **Philadelphia**, where in 1991 the Center City BID successfully persuaded the City to set up a PPD “substation” within the BID to amplify police presence.¹⁰⁴ This substation deploys dozens of extra PPD officers to patrol the BID by foot and bicycle seven days a week, and appears to be jointly funded by the BID and the City. Private BID security is also coordinated out of the substation, allowing expedited communication and a greater blurring of the line between public and private policing.

BIDs Directly Hire And Supervise Local Police Officers

In four cities WRAP has studied so far, BIDs directly hire additional police officers from local police departments to patrol their districts. These hired police officers are armed, uniformed, and authorized to make arrests and use force as usual, but report and take direction in part from BID leadership directly. Much like private security teams, these contracted officers are typically directed to specifically target poor and homeless individuals through “quality of life” policing.

San Francisco BIDs hire police through the 10B program, paying the police department directly for the officer’s services, direct how and where the officers will patrol, and create report-back structures to the BID leadership.¹⁰⁵ In every case, the BIDs demand that hired 10B officers focus

⁹⁹ [Nov. 2019 Downtown Action Organization Board Meeting](#), p.3

¹⁰⁰ [Homeless Exclusion Districts](#), p. 10

¹⁰¹ <http://colfaxave.com/wp-content/uploads/2019/03/CBID-2-12-19.pdf>, p.3

¹⁰² id.

¹⁰³ [SF hiring retired cops for mean streets of Union Square, San Francisco Chronicle](#)

¹⁰⁴ [2018-2022 Center City BID budget](#), p. 3

¹⁰⁵ [SFPD records response](#)



Overtime Austin Police officers are regularly hired to patrol the Downtown Austin BID

the majority of their work on “quality of life” crimes that criminalize poor and homeless people. For example, the Castro/Upper Market BID explicitly requires its 10B officers to issue citations for “open containers, urination in public, shoplifting, intoxication in public, vandalism, sit-lie violations, etc.”¹⁰⁶ Castro BID guidance also clarifies that the 10B officers are expected to “take action” on aggressive panhandling, substance use, trespassing, and going through garbage cans.¹⁰⁷ Several BIDs clarify that 10B officers are expected to not only promptly respond to reports of such violations, but also to engage in “self-initiated” arrests and citations.¹⁰⁸

In **Portland**, we have found a particularly blatant partnership between the Clean and Safe ESD and the Portland Police Bureau. Clean and Safe ESD pays the Portland Police Bureau directly for four contracted police officers, in addition to the officers regularly stationed in the areas of Portland that Clean and Safe ESD oversees. Private security contracted by Clean and Safe ESD has joint supervision over the officers, and it also has the authority to select and assign officers to the program.¹⁰⁹ The officers are on a common radio frequency with Clean and Safe ESD private security, allowing the officers to use private security officers as their “eyes and ears,” as the contract states.¹¹⁰

New York City BIDs have the option to hire off-duty NYPD officers for private security through the NYPD Paid Detail Unit. These officers are uniformed, armed, and “carry with them full law enforcement powers” while patrolling the BIDs.¹¹¹ Paid Detail officers report to and get assignment from the BIDs that contract them,¹¹² but are expected to work directly with on-duty NYPD officers to address violations.¹¹³ The 47th St./Diamond District BID, for example, spent \$452,707 on NYPD Paid Detail officers in 2017.¹¹⁴ Other BIDS, such as the Grand Central Partnership and the Flatiron/23rd st partnership have also hired Paid Detail officers, though how much money went to those contracts is not public information.¹¹⁵ A public records request into

¹⁰⁶ [SFPD records response](#), p. 2

¹⁰⁷ [SFPD records response](#), p. 3

¹⁰⁸ [SFPD records response](#), p. 14, 21, 24

¹⁰⁹ Portland City Contract Contract Number 30002749 For Clean & Safe Program

¹¹⁰ Portland City Contract Contract Number 30002749 For Clean & Safe Program

¹¹¹ [NYPD Paid Detail pamphlet](#), p. 2

¹¹² See [2019 Diamond District Audit](#), p.11 footnote 4

¹¹³ [NYPD Paid Detail pamphlet](#), p. 2

¹¹⁴ [2019 Diamond District Audit](#), p. 9

¹¹⁵ See the [2018 Grand Central Partnership Annual Report](#), p. 4, and the [2019 Flatiron/23rd st. Annual report](#), p.12

contracts between the Paid Detail Unit and these and other NYC BIDs may be essential to better understand how the Unit is being paid for and directed by BIDs.¹¹⁶

In **Austin**, the Downtown Austin PBID hires Austin Police (APD) officers through APD's Overtime Patrol unit. The BID contracted to have two Overtime officers patrol the BID 12 hours a day, seven days a week (on top of regular district police and BID security).¹¹⁷ Unfortunately, this research has yet to uncover any detailed account of how much is spent on these officers, or if any other BIDs in Austin are hiring through the Overtime Patrol unit. As such, a records request on that precise issue may be essential. In **Denver**, the Cherry Creek BID hires off-duty, uniformed (and armed) DPD officers to regularly patrol the BID, as well as provide extra security during events.¹¹⁸

BID Acts As The "Eyes And Ears" Of Police

The line between private and public policing becomes even further blurred by the fact that private BID security is overwhelmingly structured to assist local police departments in targeting "quality of life" violations. In almost every case, BIDs that use private security specifically highlight that these officers are meant to assist and/or act as an extension of local police departments.¹¹⁹ In some BIDs, this relationship has translated into specific communications infrastructure. This may take the form of specific communications protocols,¹²⁰ or even shared radio frequencies used by BID security and Police directly.¹²¹ In **Philadelphia's** Center City BID, this infrastructure is even more developed: BID security officers are in constant 2-way radio contact with the Police officers dispatched out of the district's substation, participate in twice-daily roll call and jointly plan deployment strategies with them, and coordinate deployment with PPD officers directly.¹²²

Whether or not any special communication infrastructure exists between BIDs and Police, the result of their close relationship is an expedited targeting of poor and homeless people with the

¹¹⁶ Note: at least one individual has attempted to access this information through Muckrock, and may be a useful contact. See [the request here](#).

¹¹⁷ See <https://downtownaustin.com/what-we-do/our-services/>; see also <https://downtownaustin.com/annual-report-2020/#services>

¹¹⁸ [2019 Cherry Creek Operating Plan](#), p.140

¹¹⁹ see: LA: Downtown Industrial BID, p. 11, [Fashion District BID](#); NYC: [125th street BID](#), [East Midtown BID](#) (p.8), [Flatiron/23rd st. BID](#), [Grand Central BID](#), and [Times Square BID](#); Oakland: [Fruitvale BID](#) (contracted through Peralta) and [Downtown/Uptown BIDs](#) (contracted through BBB); Philadelphia: [City Avenue BID](#) (p.14), [Aramingo BID](#), Fishtown Kensington Area BID (p.4), and upcoming [North Broad BID](#) (p.3); Sacramento: [Downtown Partnership BID](#), [Del Paso BID](#), p.19

¹²⁰ as in Chico's Downtown BID: [Homeless Exclusion Districts](#), p.12

¹²¹ s with Portland Clean and Safe's security officers and sidewalk ambassadors: [2014 Clean and Safe Impact Statement](#) and [Agreement for Management Services](#), p.18-19

¹²² See <https://www.centercityphila.org/ccd-services/public-safety/csr> and [2018-2022 Center City BID budget](#), p. 3



The Center City BID's 5-year budget boasts about the close working relationship between the CSRs and the Philadelphia Police Department

districts. Many BID security officers are directly instructed to call the police on individuals who are violating quality of life ordinances. In a 2017 Berkeley survey, one homeless individual in **San Francisco** stated: “everyday BID employees ask me to move. [. . .] If I don’t move, [the] cops are called.”¹²³ Security personnel in the Downtown Denver Partnership BID are expressly directed to call the police if an individual is violating a “quality of life” crime and does not comply with their orders.¹²⁴ In **Oakland**’s Fruitvale BID, Peralta security officers are specifically deployed to provide the Oakland police with surveillance and report “nuisance activity (panhandling, open container violations, etc.).”¹²⁵ In

Sacramento’s Downtown Partnership security personnel have called the police on homeless individuals receiving blankets from a distribution, saying “we can’t have you lying here.”¹²⁶ Meanwhile, **Los Angeles** Police officers collaborate directly with BID security (and cleaning) staff to perform sweeps or otherwise seize the property of homeless individuals.¹²⁷

These close working relationships are not only utilized by BID security teams, but extend to BID leadership and property owners directly. For example, in **San Francisco** when a business owner emailed the Castro CBD complaining that people were sleeping near his store, the BID’s Executive Director forwarded the complaint to a city supervisor and a police captain; the police captain and the city supervisor both responded to the complaint that same day, and the police captain sent an on-duty officer to the location the next day. The same business owner then sent two more complaints, which were responded to by a city legislative aide and the police captain. In **Sacramento**, BID executives exchanged over 2,000 emails with Police and other city officials regarding homeless people in 2015.¹²⁸ These emails include multiple exchanges between the North Franklin BID’s executive director and the SPD, asking officers to “swing by” or “help out” to remove specific homeless people from various places in the BID.¹²⁹ BIDs also used various “outreach” programs to network with Police directly as either BID leadership, or property owners. WRAP has found various forms of this type of program to exist: be it the Cherry Creek’s “community watch” in **Denver**,¹³⁰ “Neighborhood Crime Prevention Councils” in

¹²³ [Homeless Exclusion Districts](#), p. 11 (citing Policy Advocacy Clinic, Berkeley Law, Univ. of Cal., Survey of 72 Homeless People in San Francisco, Chico, and Sacramento (Spring 2017))

¹²⁴ <https://www.downtowndenver.com/newsroom/private-security-team-begins-role/>

¹²⁵ <https://peraltaservicecorporation.com/wp-content/uploads/2020/05/2019-PSC-Temp-SNAP-Ambassador.pdf>

¹²⁶ [Homeless Exclusion Districts](#), p. 12

¹²⁷ Complaint at 12, *L.A. Catholic Worker v. L.A. Downtown Indus. Dist.*, No. CV 14-07344 (C.D. Cal. Sept. 19, 2014), at ¶52.

¹²⁸ [Homeless Exclusion Districts](#), p. 10

¹²⁹ [Homeless Exclusion Districts](#), p. 10-11

¹³⁰ [Cherry Creek 2020 Operating Plan and Budget](#), p.140

Oakland;¹³¹ “Neighborhood Watch” advocated for by **Austin**’s East 6th BID;¹³² or even “Coffee with Cops” style events in **Denver** and **Oakland**.¹³³ In any case, the goal always involves a cross-conveyance of specific information about “quality of life problems” in the BIDs, and collaborating to shape policing targets and policies.

Through these various mechanisms, BIDs make use of a privileged line of communication directly to local police – a connection that is absolutely not extended to poor and homeless individuals in the districts, and is consistently used to target and criminalize them.

BIDs Operate Their Own Courts And Prosecutors

In **Sacramento**, the Downtown Partnership BID partners with the Sacramento County District Attorney’s Office to have one dedicated “community prosecutor” serving the district.¹³⁴ This prosecutor works directly with downtown business, property owners and local police to specifically prosecute “quality of life” crimes and implementation of “nuisance abatement measures.”¹³⁵ In 2019 the Partnerships’ dedicated prosecutor heard almost 200 cases.¹³⁶

In **Portland**, the Lloyd District pays for a dedicated Assistant District Attorney who exclusively prosecutes crimes in the district, and helps to coordinate the district’s prevention and safety programs. Clean & Safe also employs a staff person in the Assistant District Attorney’s office, and until recently funded the Westside Community Court.¹³⁷ The Westside Community Court is used to quickly sentence people who have been charged with quality of life crimes like drinking in public and trespassing.¹³⁸ BID funding has also covered staff to administer court-mandated community service programs, and facilitates communications between neighborhood DA offices, district property owners, and private security.¹³⁹ The consequences of these funding streams are grave: people can be arrested by police under contract with the Clean & Safe ESD, face charges from a prosecutor partially funded by Clean & Safe in a court partially funded by Clean & Safe, and sentenced to a community service program run by Clean & Safe. In other words, someone can be arrested, tried, and serve their sentence all through BID-funded programs, of which there is very little public oversight.

¹³¹ <https://jacklondonoakland.org/new-events/ncpc-meeting-2020-may>; [2020 Montclair BID Annual Report](#), p.4

¹³² [East 6th 5 year service plan](#), p. 9

¹³³ [Cherry Creek 2020 Operating Plan and Budget](#), p.140; [Feb 2020 Montclair BID Board Meeting](#), p.1

¹³⁴ [2016 Downtown Partnership Annual Report](#), p.6

¹³⁵ [2016 Downtown Partnership Annual Report](#), p. 6, see also: <https://www.sacda.org/in-the-courtroom/criminal-prosecutions/community-prosecution/>

¹³⁶ [2019 Downtown Partnership Annual report](#), p.2

¹³⁷ [Portland City Auditor, Enhanced Service Districts: City provides little oversight of privately funded public services](#) (2020), p. 4

¹³⁸ [Everyday People: Wayne Baseden's Westside Community Court is a not-so-trivial pursuit](#)

¹³⁹ <https://www.theskanner.com/news/northwest/21025-trimet-tuesday-in-portland-s-community-court>, see also: <https://www.teenvogue.com/story/business-improvement-districts-policing/amp>

From 2002-2012, **Philadelphia**'s Center City BID operated a Community Court for "quality of life crimes."¹⁴⁰ Along with vandalism and theft charges, the court, overseen by Judges from the regular criminal court, also focused on: defiant trespass, possession of drugs or drug paraphernalia, thefts, obstructing the highway/pan-handling/prostitution, and attempt or conspiracy to commit any of these crimes.¹⁴¹ According to the former project coordinator for the Court, "the goal was to get defendants before the judge as quickly as possible and to offer them community service and social services in exchange for a suspended guilty plea...[which] required the defendants to take responsibility for their behavior and to pay back the neighborhoods that had been harmed."¹⁴² Ultimately the Community court was suspended in 2012 due to funding cuts, but in its 10 years of operation the Court recorded the following statistics: more than 75,000 cases heard, defendants performed almost 540,000 hours of community service at a minimum-wage value totalling almost \$3.3 million, more than \$1.6 million in fines and costs was collected, more than \$40,000 was paid in direct "restitution."¹⁴³ The combination of mandatory guilty-plea with the above stats is made more problematic when light is shone onto the actual cases that took priority in the court: in 2007 most of the misdemeanor charges heard in the court were drug offenses, about one-third of summary offenses involved alcohol, and other prominent charges were disorderly conduct, obstructing the highway, theft of services (eg. fare jumping), loitering, and public urination cases.¹⁴⁴ These statistics put into relief the classist construction of "harm" these courts are designed to address.

BIDs Oversee Community Service Programs

In **Portland**'s Westside Community Court, defendants are encouraged to plead guilty rather than go to trial. Defendants executed their constitutional right to trial in fewer than five percent of cases.¹⁴⁵ One reason for this is defendants' limited options, which are generally "a "court hearing in six months... between now and then...you'll be in jail," or "waive that right, plead guilty tomorrow, and go to treatment right away, and by X date you will be done with your chemical-dependency treatment. *And* they'll get you a job."¹⁴⁶

When defendants pleaded guilty at the Westside Community Court, they completed their community service doing maintenance in the Clean and Safe District. And the person in charge

¹⁴⁰ <https://www.centercityphila.org/ccd-services/public-safety/crime-prevention>

¹⁴¹ [Goktug Morcol, Center City District: A Case of Comprehensive Downtown Bids, 3 Drexel L. Rev. 271 \(2010\)](#), p.2, 12 footnote 82

¹⁴² [Philadelphia Community Court: A Model for Other Pennsylvania Cities](#), p. 1

¹⁴³ [Philadelphia Community Court: A Model for Other Pennsylvania Cities](#), p. 2-3

¹⁴⁴ [2010 Philadelphia Community Court Evaluation Final Report](#), p.20 ; see also [2009 Process Evaluation Of The Philadelphia Community Court](#), p. 40-42

¹⁴⁵ An Examination of Portland's BID: Their History and Approach

¹⁴⁶ Berman, Greg and John Feinblatt. Good Courts: The Case for Problem Solving Justice. New York: The New Press, 200

of assigning community service was the court coordinator for the Portland Business Alliance.¹⁴⁷ Since the court was founded in 2002, over 15,000 defendants have completed an estimated \$958,456 worth of free labor for the Downtown Clean and Safe ESD. That is the same Downtown Clean and Safe ESD that pays for and oversees the off-duty police officers who make many of the arrests.

BIDs Work with Public Agencies to Criminalize the Presence of Poor and Homeless People in Public Spaces

In 2019, **Sacramento**'s Greater Broadway Partnership collaborated with the City of Sacramento to file a civil lawsuit that would permanently ban 7 homeless individuals from the BID.¹⁴⁸ This is the first suit of its kind to use injunctions to ban homeless individuals from public space, however it can also be seen as an extension of California's long legacy of allowing police to use injunctions to target and control POC communities.¹⁴⁹ That same year in **Oakland**, the Downtown/Lake Merritt BID successfully got a single "stay away" order against a homeless individual living in the district. According to one member of the Clean and Safe committee "one of the highlights of the quarter was obtaining a Stay Away Order for a problematic individual who took up residence in Franklin Square. Obtaining the Stay Away Order, was the first step in regaining some level of control of the public space."¹⁵⁰

In at least two cities, **Los Angeles**¹⁵¹ and **Denver**¹⁵², BIDs have organized with local police departments and city agencies to obtain expedited Trespass Enforcement Agreements over BID properties. These agreements allow officers to arrest individuals for trespassing without having to go through the typical procedure of first contacting the property owner for authorization. In some cities, these types of agreements include a warning clause, which gives police the authority to arrest an individual of trespassing after a single warning, even if that warning was made a year or more ago.¹⁵³ More research is needed to determine if similar warning clauses exist in the Los Angeles and Denver agreements. In either case, these agreements allow police to quickly and easily harass and arrest homeless people sleeping in doorways, parking lots, or other private property.

¹⁴⁷ TriMet Tuesday in Portland's Community Court

¹⁴⁸ https://www.huffpost.com/entry/sacramento-bans-7-homeless-men_n_5d5edb4fe4b0dfcbd48a253a

¹⁴⁹ See <https://www.aclusocal.org/en/press-releases/court-issues-historic-ruling-against-gang-injunctions-la>

¹⁵⁰ <https://www.scribd.com/document/438086432/Clean-Safe-Meeting-June-19-2019> p. 10

¹⁵¹ <http://onlyinhollywood.org/wp-content/uploads/2014/04/Trespass-Arrest-Authorization.pdf>

¹⁵² See [2016 Action Plan press conference](#), at 10:30; see also <https://www.downtowndenver.com/initiatives-and-planning/security-action-plan/business-owner-resources/>

¹⁵³ E.g. Portland's program of trespass agreements: <https://www.portlandoregon.gov/police/article/541450>

V. BIDs Lobby For Laws That Criminalize Homelessness

There are countless examples of BIDs using their political influence to push policies and legislation that further criminalize homelessness, and attack those seeking to roll such criminalization back. Importantly, their methods are not static - BIDs across the country are constantly trying to increase their influence, acting as laboratories for new forms of criminalization and privatization. When a new law or policy proves effective, it can travel quickly within and between cities because BIDs are in regular communication with each other. These networks allow BIDs to flex their economic power on local, state, and national levels. Below are some examples of the tactics that BIDs use to target poor and homeless communities.

BIDs Have A Direct Influence On Local Governments

Camping Bans: Between 2011-2012, the Downtown Denver Partnership lobbied city council for a camping ban that criminalized the act of sleeping outdoors.¹⁵⁴ In its annual report from that year, the DDP boasted about its involvement in creating the ban, stating: “The Partnership helped lead the successful lobbying efforts to institute a city-wide unauthorized camping ban to address behaviors negatively affecting businesses and the Downtown environment.”¹⁵⁵ Moreover, when the Right to Survive campaign sought to overturn the ban in 2019, the DDP donated \$200,000 to Together



The Downtown Denver Partnership worked in direct collaboration with the City and with former Chief of Police Robert C. White to roll out the Downtown Denver Security Plan

Denver, the coalition established to lobby against the initiative.¹⁵⁶ The DDO has also been successful in getting a specific section added to the Denver City Code stating that it is illegal to sit or lie down specifically within the boundaries of the Downtown Denver BID.¹⁵⁷ In Portland, the Clean & Safe ESD was part of a lawsuit against the City of Portland for allowing overnight sleeping on sidewalks.¹⁵⁸ Based on the sinister popularity of camping bans in cities across the country, it is likely that other BIDs are engaging in similar lobbying.

Other examples: In 2015, Los Angeles’ Hollywood Partnership argued at public hearings against a proposal to allow sidewalk vending throughout the city.¹⁵⁹ In 2017, all 11 Sacramento BIDs

¹⁵⁴ <https://denverite.com/2018/09/20/denver-homeless-policy-business/>; <https://www.5280.com/2020/02/what-you-need-to-know-about-denvers-urban-camping-ban/>

¹⁵⁵ [2011-2012 DDP annual report](#), p.4

¹⁵⁶ <https://unicornriot.ninja/2019/denvers-right-to-survive-ballot-initiative-voted-down/>

¹⁵⁷ <https://www.law.du.edu/documents/homeless-advocacy-policy-project/2-16-16-Final-Report.pdf> p. 17

¹⁵⁸ See https://www.oregonlive.com/portland/2016/04/portland_sued_over_homeless_ca.html

¹⁵⁹ http://onlyinhollywood.org/wp-content/uploads/2014/03/2015HPOA_AnnualReport_web.pdf p.6

opposed an amendment to the city code that would have removed conditional use permitting requirements for churches and faith congregations hoping to serve as small temporary residential shelters for adults. This year, Austin’s East 6th St. BID declared one of the focus points of its “public safety” committee as: “[Exploring] possible amendments to existing Anti-Solicitation Ordinance (Ord.20051215-017),” an anti-panhandling ordinance.¹⁶⁰

BIDs Lobby At State And National Levels

On the state and national levels, BIDs join larger lobbying organizations to increase their influence. Many California BIDs, like the Union Square BID and the LA Downtown Industrial District BID, are members of the California Downtown Association. The CDA hosts annual conferences where BIDs can share strategies and lobby elected officials: in 2017 Oakland City Council President Lynette Gibson McElhaney said during her conference welcome, Oakland is thriving because “of the hard, tireless work of the Business Improvement Districts that we are rising up to the place we always knew could be reached.”¹⁶¹ The CDA also puts out a monthly newsletter on state legislative updates and coordinates lobbying efforts. Among the victories that CDA claims are: defeating SB608, the Right to Rest act, and AB5, the Homeless Person’s Bill of Rights, and pushing through SB 1186, which made it much harder to file disability lawsuits.¹⁶²

The International Downtown Association is an organization that serves primarily to connect Business Improvement Districts, consulting firms, government agencies, academics, and service providers like Block by Block. The IDA also conducts research to promote private-public partnerships, provides position statements for members, runs a certification program linked to elite universities, and conducts PR for its members, which it calls the “urban place management” industry. Each year, the IDA runs an annual conference that is attended by cleaning and security firms, sympathetic government officials, influential think tanks, and BIDs from around the world. Above all, the annual IDA conference is a networking space that allows BID boosters to casually rub shoulders with government officials, laying a foundation for the official lobbying practices BIDs engage in the rest of the year.

Speakers at the 2020 annual conference included several Brookings Institute fellows, former HUD officials, a Canadian parliament member, and the founder of the Global Business Districts Innovation Club. Each day there was a virtual marketplace where cities brought Requests for Proposals and looked for companies to fill them. There were also dozens of panels where BIDs and private companies could show off their programs. At the “Public Safety Alternatives” panel, the executive director of a sobering center in Austin described it as an alternative to free up space in jails. Clients are supposed to consent to being sent to the sobering center, but the center had to

¹⁶⁰ <https://www.austintexas.gov/edims/document.cfm?id=325408> p.4; see also the ordinance: <https://www.austintexas.gov/edims/document.cfm?id=94345>

¹⁶¹ <https://downtownlongbeach.org/dtlb-to-host-2017-california-downtown-association-conference/?print=print>

¹⁶² <https://californiadowntown.com/legislation/>

put up a “you are not in jail” sign after clients were continually confused. Panelists at “One at a time: A Different Approach to Homelessness” included the Executive Director of the Downtown Reno BID and the president of the Chicago Loop Alliance. Discussion focused on a policing method called the “one at a time approach,” which targets and tracks a small group of homeless people to try and permanently remove them from an area. Each year the IDA annual conference allows BIDs to share information and lobby government officials for policies that shift management and policing of public space into the hands of private entities.

VI. Further Research

BIDs are constantly developing and exchanging new techniques for increasing their control over public spaces and criminalizing the presence of poor and homeless people. Therefore it is important that further research continues to monitor the policing and surveillance programs funded by BIDs. What is most prevalent today may not be most prevalent in five years. Emerging techniques, like permanent stay-away orders, need to be identified and combatted before they spread across the country through intercity BID networks. Related, WRAP has yet to really delve into the national and multi-national security firms hired by local BIDs. Sub-contractors such as Block-by-Block and Allied Security work in cities across the country, hiring current and former police officers on their private security forces. It is crucial to uncover details of how these broader networks operate, the flows of capital involved, and their ties to public police and military agencies.

Moreover, the BID model is on the move. While the vast majority of BIDs developed throughout the last forty years exist in downtown commercial spaces, BIDs are beginning to emerge in a growing number of residential neighborhoods and areas primarily comprised of parks and green spaces such as in San Francisco’s Potrero Hill Green Benefit District--essentially following homeless people pushed out of shopping districts. While we do not yet have precise knowledge of how rapidly the model is expanding nationally, WRAP recognizes that moves to de-fund police departments may inadvertently exacerbate the spread of BIDs, and urges fellow abolitionists to be alert to this possibility in our analyses. In addition, BIDs fund some specific programs and practices that WRAP knows exist but has few details about their inner workings. These include anti-homeless architecture, surveillance networks, collaboration with residents who are anti-homeless, and ambassador programs that hire homeless and formerly homeless people, themselves, to clean and police neighborhoods. Each of these types of program is an important area for further research.

Finally, the methodology of our research, which focuses on collecting and analyzing public documents, relies heavily on narratives produced by BIDs themselves. Much of the information detailed in this memo comes from BIDs’ management plans and annual reports. Further research

that centers the experiences of poor and homeless people in their interactions with BIDs will allow us to see how BID narratives align with or distort realities on the ground.