## Short-Term Rental Zoning and Registration Ordinances City Council Briefing June 7, 2023

Julia Ryan, AICP Director Planning and Urban Design

Chris Christian Director Code Compliance Services

Brita Andercheck, PhD. Director Data Analytics & Business Intelligence

> Vernon Young Assistant Director Development Services



# **Presentation Overview**

- Background and Purpose
- Zoning: Planning and Urban Design
- Enforcement: Code Compliance Services
- Data Analytics: Data Analytics & Business Intelligence
- Certificate of Occupancy: Development Services



# **Background & Purpose**



#### Background

- Staff Briefed the City Council on April 4, 2023
- On April 14, 2023, Assistant City Manager Carl Simpson released a memo identifying four areas requiring additional time to research.

#### Purpose

• In this briefing, Staff will report on their findings and respond to the questions that arose on April 4, 2023, related to zoning, enforcement, data analysis, and certificates of occupancy.





# **Zoning: Planning and Urban Design**

On April 4, 2023, Council discussed the possibility of alternatives to the City Plan Commission's recommendations and other land use solutions. Council also requested maps showing multifamily zoning districts and further analysis of existing short-term rentals within zoning and Council districts.



# **STR Zoning Options**

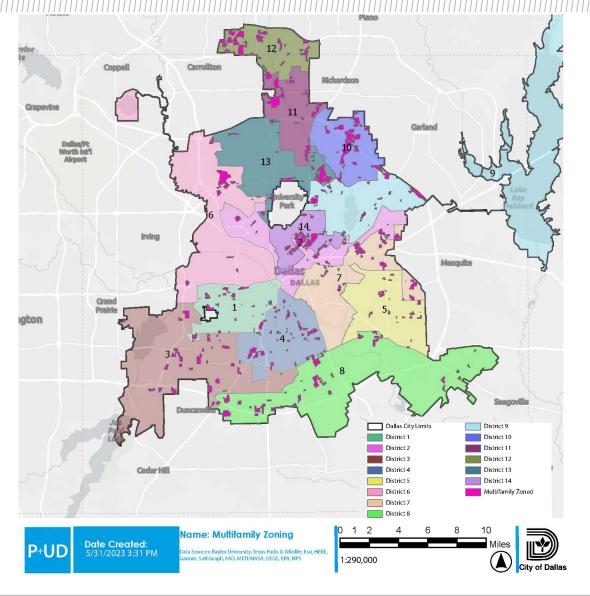


| Option  | ZOAC                                   | СРС  | Action needed   |  |  |  |
|---|--|--|---|--|--|--|
| Permit in more districts<br>(MF, R, TH, CH, etc.) | Discussed;<br>Recommendation to<br>CPC | Discussed;<br>Recommendation to CC<br>as presented             | <ul> <li>None; City Council can</li> <li>discuss and move</li> <li>forward after</li> <li>appropriate legal notice</li> </ul> |  |  |  |
| Accessory Use (Home-<br>sharing)                  | Discussed; Not<br>forwarded to CPC     | Requested<br>presentation and<br>discussed; No action<br>taken | CPC must hold public<br>hearing and make<br>recommendation  |  |  |  |
| Neighborhood Overlay<br>(opt-in or opt-out)       | Not discussed                          | Not discussed  | Must start process from<br>beginning; ZOAC -> CPC<br>-> City Council  |  |  |  |
| Consider STR as a<br>Residential Use              | Not discussed                          | Not discussed  | Must start process from<br>beginning; ZOAC -> CPC<br>-> City Council  |  |  |  |



# Zoning District/STR Analysis



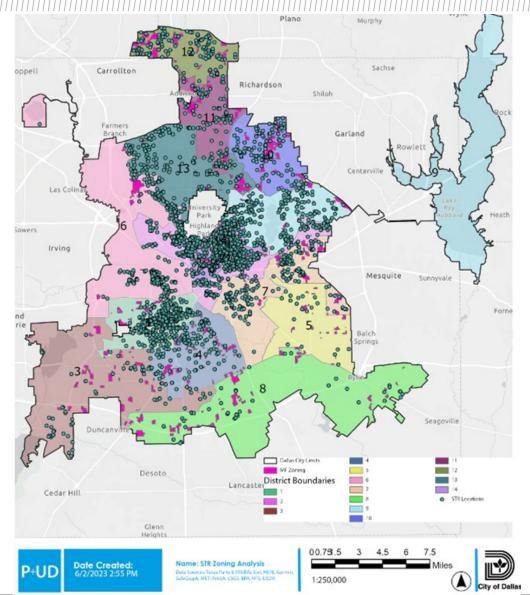


#### Map of Multifamily Zoning Districts

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# Zoning District/STR Analysis





#### Map of Identified STRs

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## Zoning\* Distribution of Identified STR by District



|       | AG | CENTRAL | CD  | СН | CS | DUPLEX | IM/IR | COMM | MF  | MU | OFFICE | PD  | R-X  | RETAIL | TH | FORM | TOTAL |
|-------|----|---------|-----|----|----|--------|-------|------|-----|----|--------|-----|------|--------|----|------|-------|
| 1     |    |         | 85  | 1  |    | 5      |       |      | 4   | 5  |        | 162 | 138  | 1      | 3  |      | 404   |
| 2     |    | 1       |     |    | 3  | 13     | 1     | 1    | 95  | 2  |        | 219 | 64   | 6      | 4  | 1    | 410   |
| 3     |    |         |     |    |    |        |       |      | 3   |    |        | 18  | 48   | 0      | 3  |      | 72    |
| 4     |    |         |     |    |    |        |       |      | 2   |    |        | 10  | 113  | 5      | 5  |      | 135   |
| 5     |    |         |     |    |    |        |       |      |     |    |        | 2   | 16   | 0      | 1  |      | 19    |
| 6     |    |         |     |    | 1  | 1      | 3     |      | 4   | 1  |        | 40  | 145  | 2      | 7  |      | 204   |
| 7     |    |         |     |    |    | 3      | 1     |      | 9   |    |        | 85  | 66   | 0      | 7  |      | 171   |
| 8     | 2  |         |     |    | 2  | 1      |       |      |     |    |        | 4   | 30   | 0      | 0  |      | 39    |
| 9     |    |         | 2   |    |    | 12     |       |      | 17  | 1  |        | 7   | 147  | 1      | 9  |      | 196   |
| 10    |    |         |     |    |    | 1      |       |      | 14  | 1  |        | 12  | 68   | 1      | 17 |      | 114   |
| 11    |    |         |     |    |    | 13     |       |      | 17  | 7  |        | 7   | 64   | 1      | 2  |      | 111   |
| 12    |    |         |     |    |    | 6      |       |      | 10  |    |        | 33  | 43   | 2      | 21 |      | 115   |
| 13    |    |         | 1   |    |    | 9      |       | 1    | 13  | 3  |        | 23  | 124  | 4      | 8  |      | 186   |
| 14    |    | 8       | 83  |    |    | 27     |       |      | 115 |    | 5      | 351 | 88   | 5      | 7  |      | 689   |
| TOTAL | 2  | 9       | 171 | 1  | 6  | 91     | 5     | 2    | 303 | 20 | 5      | 973 | 1154 | 28     | 94 | 1    | 2865  |

Geocoded data CCO/DBI June 2023;

\*City of Dallas Base Zoning 8



# **Enforcement: Code Compliance Services**

On April 4, 2023, Council questioned the possibility of launching enforcement in 6 months instead of the presented 12-month model. Council also requested additional information regarding the onsite caretaker and multi-family models.



#### 1

**Onsite Caretaker/ Multi-Family Requirement** 

#### Caretaker required to be onsite

- Must be onsite during entire length of STR use for any property type
- Must register as caretaker on application and include government issued identification
- Must accept responsibility for violations occurring during STR use

#### **Multi-Family Registration Requirements**

- Include affidavit as acknowledgement of presence and responsibility of all onsite STRs by multi-family property owner & management
- Unregistered STRs discovered within a multi-family property will result in the property manager/owner being issued a notice of violation or citation







#### **Onsite Caretaker/ Multi-Family Requirement**

#### Enforcement

- Investigate concern(s)
- Confirm violation(s)
- Attempt contact with responsible parties
  - If contact is achieved, responsible parties take reasonable action to resolve concerns
  - Should contact not be achieved, responsible parties may be issued citation(s)
- Issue citations as needed





#### **Enforcement Timeframe**



#### Feasibility of launching enforcement implementation timeline in 6 months

- Will be challenging without adequate staffing and enforcement software
- Enforcement can be implemented with the following expectations
  - Reactive complaint-based enforcement only
  - Enforcement activity
    - No after-hours enforcement due to lack of staffing, 7:00 am 6:00 pm everyday
    - Late night or after-hours calls will be investigated the next business day
    - Enforce failure to register and/or illegal land use only





## Data Analytics: Data Analytics & Business Intelligence

On April 4, 2023, Council requested additional data analysis including public safety call types.



# Data Analysis



- In April 2023, City Council asked DBI to provide an updated and expanded analysis that included a focus on Public Safety in addition to nuisance related issues.
- DBI worked with DPD, DFR, CCS, and 311 as subject matter experts on the selection of the call types that were utilized in the analysis.
  - 103 call types were selected, presented as 42 call categories
- DBI partnered with the City Controller's Office and ITS to work to determine if there were additional residential STRs in the City of Dallas beyond those captured by GovOS.



# Data - 311 and Code Compliance Variables

# All 311 and Code Compliance variables were selected based on the recommendation from subject matter experts at 311 and Code Compliance.

- 19 call types related to public nuisance, non-emergency calls were identified and extracted from the CRM system
  - Code Concern Litter
  - Code Concern Bulky Trash
  - Code Concern Noise Complaint
  - Code Concern Outside Storage
  - Code Concern High Weeds
  - Code Concern Parking on Unapproved Surface
  - Code Concern Dangerous Condition
  - Code Concern Illegal Land Use
  - Code Concern Illegal Garbage Placement

- Parking Report a Violation
- Chronic Noise Complaint
- Extra Police Patrol
- Narcotics/ Vice Complaint
- Criminal Activities (Non-Emergency)
- Street/ Road Blockage
- Handicap Parking Violation
- Parking in Fire Lane/ Hydrant
- Short Term/ Vacation Rental Survey
- Miscellaneous Service Request



## Data – DPD 911 Variables



#### All 911 DPD variables selected for nuisance and public safety were selected based on recommendation from subject matter experts at DPD.

- Data was extracted from the Response Master Incident table of the City's Computer Aided Dispatch (CAD) system and Dallas Online Reporting system (DORS).
- 66 call types were identified by DPD as relevant call types for nuisance and public safety for this STR study.
- All 66 call types could be aggregated into the following 13 categories.

- Theft
- Burglary
- Shooting/ stabbing
- Aggravated assault
- Sexual assault

- Major disturbance
- Missing person/ abductions
- Mischief
- Prostitution
- Suicide

- Gun fire
- Parking & roadways
- Loud noise

## Data – DFR 911 Variables



## All 911 DFR variables selected for public safety were selected based on recommendation from subject matter experts at DFR.

- Data was extracted from the Response Master Incident table of the City's Computer Aided Dispatch (CAD) system.
- 18 call types related to 8 different categories of public safety were identified and extracted from the CAD system.
  - Aggravated Assault
  - Sexual Assault
  - Injured Person
  - Gun Shot Wound

- Stabbing
- Mental Health
- Suicide
- Overdose



# **Data Analysis- Limitations**



All data analyses, have limitations and this is no exception. We made many assumptions, which are listed in the paper, including:

- Each STR related call was unique and there were no duplicate calls.
- That each call is attributed to the proper address, and not a neighboring address.
- The property was operating as an STR during the time of the call for service.



# Data Analysis- Results



#### Results

- During the period of January 2023 through April 2023, there were 43,673 public safety and nuisance related calls (103 call types) received from residential properties citywide through 311 and 911.
- Of these, 1,216 (3%) came from residential STRs.
- 95 (4%) residential STRs generated 3 or more calls for the 103 call types and were considered outliers.
- Residential STRs had a higher average number of calls associated with their addresses than non-STR properties, however <u>this difference is less than one call.</u>
- During the same time period, 311 and 911 received over 1 million calls overall.
- 1,907 (80%) residential STRs generated zero calls for the 103 call types analyzed.





## Development Services: Certificate of Occupancy

On April 4, 2023, Council questioned if short-term rentals would require a certificate of occupancy. Council asked for more information related to establishing a processing and inspection fee, inspection strategy, and training.



# DSD – Certificate of Occupancy



Current Fee Structure for a Certificate of Occupancy (CofO)

- \$280.00 per CofO and will be charged for each Short-Term Rental Unit
- Building, Mechanical, Electrical, Plumbing, and Fire (based DFR recommendations) Inspections would be performed by DSD
- DSD recommends a CofO reinspection to be performed annually and when change of owner occurs
- DSD will consult with a Fee Assessment Consultant to discuss fee, volume, and time associated with these inspections and include DFR inspection details
- CofO inspections would be performed next business day as requested 95% of the time
- Consideration of CofO Fee for STR units will be evaluated through consultant
- Third Party inspection service provider may be leveraged based on proposed volume
- DSD would partner with CAO, CCS, and DFR to proactively educate customers and create inspection checklists
- Additional Senior Inspector (1) would be required to facilitate workflow process, coordination, and preliminary assessments



#### Short-Term Rental Zoning and Registration Ordinances

#### City Council Briefing June 7, 2023

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> Vernon Young Assistant Director Development Services



# City of Dallas



# Appendix



# City of Dallas

## Short-Term Rental Zoning and Registration Ordinances

# City Council briefing April 4, 2023

Andreea Udrea, PhD, AICP Assistant Director Planning and Urban Design

Chris Christian, Director Code Compliance Services

Jeremy Reed, Assistant Director Code Compliance Services<sub>25</sub>

# Presentation Overview

- Presentation Purpose
- Background
- CPC Recommended Zoning Ordinance
- Quality of Life Information Request
- Proposed Registration Ordinance
- Proposed Regulations
- Resource Needs



# Purpose



- Provide City Council with an update of the Short-Term Rental Zoning Ordinance (Chapter 51A) process and recommendation of the City Plan Commission
- Provide Code Compliance's summary of recommendations regarding the registration ordinance and enforcement process



# Timeline (2020-2021)



#### <u>2020- 2020</u>

• June – December meetings of the Quality of Life, Arts and Culture Committee (QLAC) STR Task Force

#### <u>2021</u>

- January: briefing at QLAC
- February: closed session briefing at QLAC
- March: briefing at QLAC
- May: public comments at City Council
- November December: QLAC STR Task Force
   CPC separate action:
- December: City Plan Commission authorized code amendment to define STRs as "Lodging Use"

# **Timeline - 2022**



#### <u>2022</u>

- January February: QLAC Task Force
- May 4, June 1, June 15: City Council briefings
- June 7: memorandum signed by 5 City Council Members to City Manager

#### ZOAC/CPC

- June September: Zoning Ordinance Advisory Committee meetings(ZOAC)
- October 4: ZOAC recommendation to City Plan Commission (CPC)
- November: CPC Briefing (+executive session)
- December 8: CPC Public Hearing and Action

# Case DCA212-002



- City Plan Commission authorized code amendment on December 2, 2021:
  - Consideration of amending Chapters 51 and 51A of the Dallas Development Code, with consideration to be given to amending Section 51-4.216.1, "Lodging Uses" and Section 51A-4.205 "Lodging Uses" to define a new use called "Short-term rental lodging" and related regulations.
- City Plan Commission recommendation on December 8, 2022: City Plan Commission voted (9-4; 2 places vacant) to recommend to City Council an amendment to Section 51A-4.205. LODGING USES for the following:





## CPC Recommended Zoning Ordinance (cont'd)

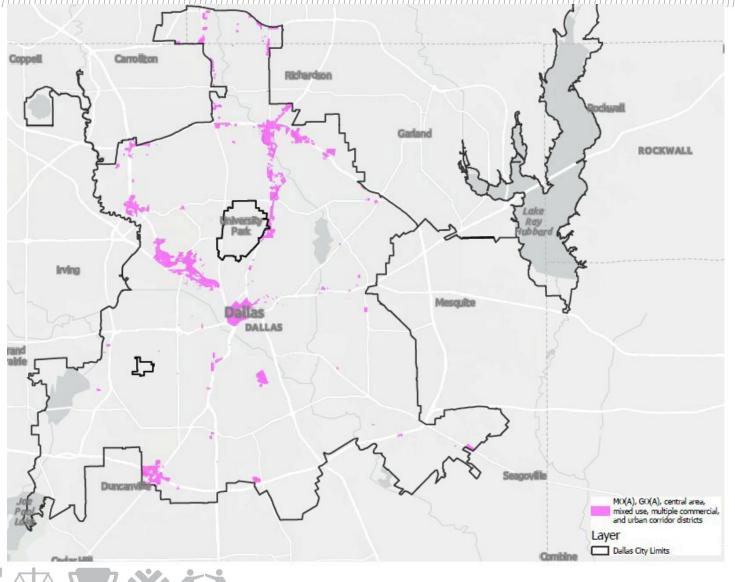


- **Definition:** A full or partial building containing one or more kitchens, one or more bathrooms, and one or more bedrooms that is rented to occupants for fewer than 30 consecutive days per rental period.
- Districts permitted: By right in Mid-Range Office (MO(A)), General Office (GO(A), central area, mixed use, multiple commercial, and urban corridor districts. {Non-residential districts}
- **Required off-street parking**: One space per full or partial unit rented to occupants.



# **CPC Recommended Zoning Districts**





#### 33

## CPC Recommended Zoning Ordinance (cont'd)



- This use must comply with Chapter 42B, "Short-Term Rentals" of the Dallas City Code. (\*new chapter for regulations)
- The number of short-term rentals in a single unit may not exceed one.
- A short-term rental must not be used as a commercial amusement (inside), commercial amusement (outside), restaurant with drive-in or drive-through service, restaurant without drive-in or drive-through service, or <u>any other use</u> unless located in a zoning district in which the use is permitted and a Certificate of Occupancy is issued for the use.



## CPC Recommended Zoning Ordinance (cont'd)



• Short-term rental lodging is prohibited in a multifamily structure or development that has received and utilized a development bonus under Division 51A-4.1100 "Mixed Income Housing."



# **CPC/ZOAC** Discussion – Accessory Use



- **ZOAC**: Accessory use option requested by ZOAC. Voted to not move item forward.
  - Allow the use of a property as an STR *only* if there is a primary resident that lives at the property (established by homestead exemption, voter registration, etc.)
- **CPC**: Accessory use discussion requested by CPC. Briefed and discussed at December 8, 2022 CPC meeting. No action taken.





To establish regulations to protect the health and safety of occupants of short-term rental properties, to protect the integrity of the districts in which short-term rental properties operate, and to preserve the neighborhood character of residential districts within the city and to minimize adverse impacts to the housing supply caused by the conversion of residential units to transient use.

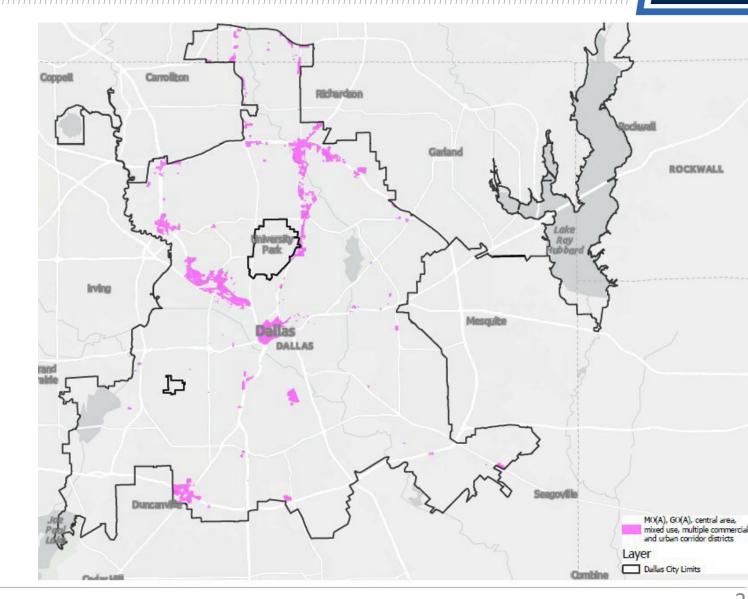
Written by and recommended approval by CPC to include in enacting ordinance, not in Chapter 51A.



# **CPC Recommended Zoning Districts**

- Districts permitted: By right in Mid-Range Office (A), General Office(A), central area, mixed use, multiple commercial, and urban corridor districts.
- There may be existing single family or multifamily neighborhoods in these zoning districts.

YXT





# **STRs and Zoning Districts**

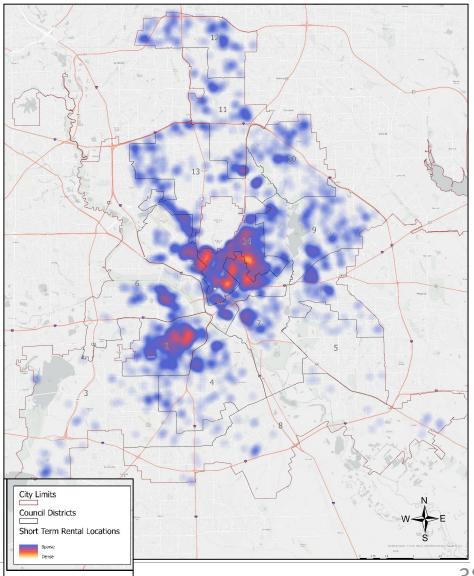
| Short-Term      | Sh                                       |                                  |          |
|-----------------|--|----------------------------------|----------|
| Zoning District | Number of<br>Active /<br>Pending<br>STRs | Zoning District<br>Share of STRs | Zoning [ |
| A(A)            | 1  | 0%                               | R-1/2ac( |
| CA-1(A)         | 18                                       | 1%                               | R-10(A)  |
| CD              | 146                                      | 6%                               | R-13(A)  |
| СН              | 1  | 0%                               | R-16(A)  |
| CR              | 23                                       | 1%                               | R-1ac(A) |
| CS              | 7  | 0%                               | R-5(A)   |
| D(A)            | 80                                       | 3%                               | R-7.5(A) |
| GO(A)           | 1  | 0%                               | RR       |
| IR              | 1  | 0%                               | TH-1(A)  |
| LO-1            | 2  | 0%                               | TH-2(A)  |
| MF-1(A)         | 84                                       | 3%                               | TH-3(A)  |
| MF-2(A)         | 238                                      | 9%                               | WR-5     |
| MF-3(A)         | 6  | 0%                               | Total    |
| MU-1            | 7  | 0%                               | Total    |
| MU-2            | 15                                       | 1%                               | Unde     |
| MU-3            | 6  | 0%                               |          |
| MU-3(SAH)       | 1  | 0%                               | appi     |
| NS(A)           | 2  | 0%                               | WOU      |
| PD              | 919                                      | 35%                              | with     |

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| Short-Term Rentals by Zoning District |  |                                  |  |  |  |  |  |  |
|---------------------------------------|--|----------------------------------|--|--|--|--|--|--|
| Zoning District                       | Number of<br>Active /<br>Pending<br>STRs | Zoning District<br>Share of STRs |  |  |  |  |  |  |
| R-1/2ac(A)                            | 7  | 0%                               |  |  |  |  |  |  |
| R-10(A)                               | 94                                       | 4%                               |  |  |  |  |  |  |
| R-13(A)                               | 4  | 0%                               |  |  |  |  |  |  |
| R-16(A)                               | 34                                       | 1%                               |  |  |  |  |  |  |
| R-1ac(A)                              | 4  | 0%                               |  |  |  |  |  |  |
| R-5(A)                                | 119                                      | 5%                               |  |  |  |  |  |  |
| R-7.5(A)                              | 711                                      | 27%                              |  |  |  |  |  |  |
| RR                                    | 3  | 0%                               |  |  |  |  |  |  |
| TH-1(A)                               | 11                                       | 0%                               |  |  |  |  |  |  |
| TH-2(A)                               | 24                                       | 1%                               |  |  |  |  |  |  |
| TH-3(A)                               | 40                                       | 2%                               |  |  |  |  |  |  |
| WR-5                                  | 3  | 0%                               |  |  |  |  |  |  |
| Total                                 | 2,612                                    |                                  |  |  |  |  |  |  |

Under CPC's recommendation, approximately 48 (1.8%) operating STRs would be permitted, assuming registration with Code Compliance Services. This calculation does not include PDs.

Data source: Dallas City Controller's Office [STR locations]; Planning & Urban Design [zoning districts]. August 2022.



# **Public Comment**



- ZOAC (6 meetings; 1 meeting just for public input)
  - 209 Registered speakers
  - 298 Emails
- CPC (1 meeting with public input)
  - 109 Registered speakers
  - 166 Emails



# Quality of Life Request – Opt-In Option



- ADU opt-in option process:
  - Property owners of a majority of the lots in the proposed overlay of sign petition
  - Area with 50+ single family homes or entire original subdivision, if less than 50 homes
  - Follows modified re-zoning hearing procedures: neighborhood meeting, CPC, then Council
- No opt-ins have been requested





# Proposed Registration Ordinance (Chapter 42B)

Chris Christian, Director Code Compliance Services City of Dallas





- Add new Chapter 42B Short- Term Rentals
- Require all STR owners/hosts to:
  - Register annually through application
    - Owner/operator, address, telephone number, property address, owner's driver's license number
    - HOT registration number
    - Acknowledgement of occupancy limits, parking requirements, noise limitations, and revocation process
    - Permission to host if not operated by owner



- Require all STR owners/hosts to:
  - Pay annual registration fee \$248.00
    - Registration expires one year after registration date or when ownership changes
  - Allow initial inspection of property upon application and for renewal
    - If initial inspection violations exist, **\$144.00 reinspection fee**
    - Property may qualify for the Self Certification program
      - If no code violations within previous 12 months





- Require all STR owners/hosts to:
  - Be a good neighbor
    - Adhere to occupancy limits of three people per bedroom
    - No amplified sound equipment audible beyond property line between the hours of 10:00 pm – 7:00 am
    - Minimum rental period two nights
    - Limit maximum number of motor vehicles to the number of available off-street parking spaces
    - Public listings/advertisement must include rental registration number, occupancy limits, noise limits, number of vehicles allowed, and city regulations related to parking on unapproved surfaces and oversized vehicles





- Require all STR owners/hosts to:
  - Provide name of emergency contact
    - Identify local responsible party
    - May be contacted 24 hours a day, seven days per week in the event of emergency
    - Property owner/host/local responsible party must respond on site within one hour
      - Must notify city within 10 days of any change
  - Post certificate of registration in common area of property



- Hosting platform to:
  - Promote responsible STR management and ownership
    - We are requesting hosting platforms not collect fees for facilitating transactions of unregistered properties
    - Require hosting platforms to register
    - Require hosting platforms provide a monthly report of active listings within City of Dallas





- Denial of registration
  - Noncompliance with all requirements
  - False statements on application
  - Failed inspections/not in compliance with zoning regulations and minimum property standards
  - Three or more citations for violations of Dallas City Code within previous 12 months prior to application
  - Within 2,000 feet from another registered STR
  - Delinquent ad valorem taxes, fees, fines or penalties owed to the city; delinquent HOT
  - Revocation of STR registration within past 12 months



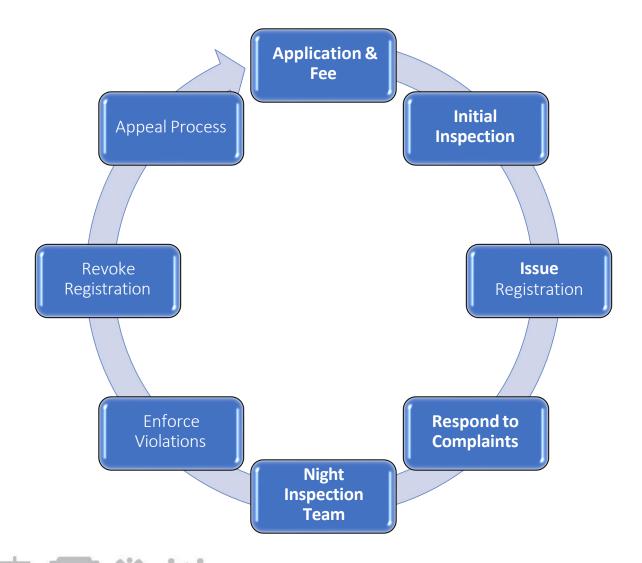


- Revocation of Registration
  - Three or more citations for violations of Dallas City Code within 12month period
  - Occurrence of egregious offense on property (commission of crimes related to drugs, prostitution, or serious breach of peace)
  - Owner to be notified of revocation and right to appeal in writing
  - Owner not permitted to apply for STR registration for one year following date of revocation
  - Revocation is final until Permit License and Appeal Board makes
     final decision



# **Registration Process**





Revocation Enforcement Tool May occur after three citations within one year; STR registration may be revoked, and the address barred from applying for renewal of registration for one year

- Includes but is not limited to parking, noise, litter, destruction of property, disorderly/criminal conduct or failure to pay hotel occupancy taxes
- Locations with a revoked registration may appeal to the Permit, License and Appeal Board for review

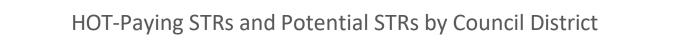


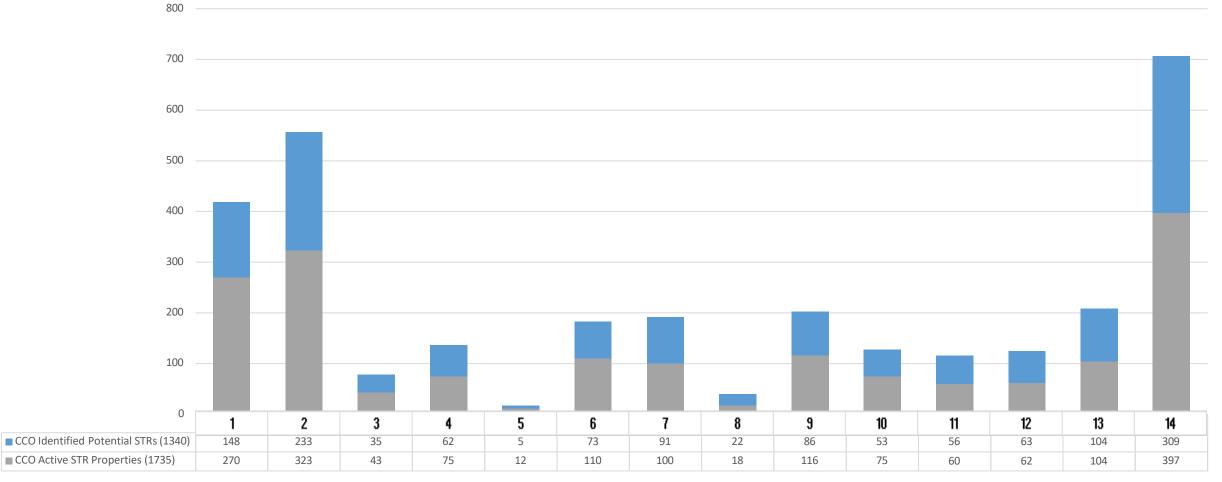
# Proposed Regulations and Resource Needs

Jeremy Reed, Assistant Director Code Compliance Services City of Dallas









As of 3.27.2023



## Acceptance of CPC Recommendations

- Appx. 95% of properties operating as STRs and paying HOT are within Residential zoned areas
  - 1,765 total HOT-paying STRs as of March 27, 2023
  - These properties will be in violation for illegal land use upon effective date of the ordinance
  - Complaint-based enforcement; proactive enforcement for illegal operators (with approval of compliance and enforcement software)





## Acceptance of CPC Recommendations

- Delay effective date of the ordinance to provide property owners in unapproved zones time to transition to allowable uses
- Register and inspect properties in allowed zones
  - Complaint-based and proactive enforcement of registration and operational requirements
  - Set registration and inspection fees to capture program costs for legal operators
- Conduct illegal land use enforcement in unapproved zones
  - Enforcement costs for illegal operators will need to be absorbed in general fund budget





## **Reject or modify CPC Recommendations**

- Proceed with registration ordinance upon adoption of zoning ordinance
- Register and inspect properties in allowed zones
  - Complaint-based and proactive enforcement of registration and operational requirements
  - Set registration and inspection fees to capture program costs for legal operators
- Conduct illegal land use enforcement in unapproved zones
  - Enforcement costs for illegal operators will need to be absorbed in general fund budget





#### Staffing

#### Accept CPC Recommendation (Presumed 150 STRs)

- One (1) Supervisor for scheduling and registration program management
- One (1) Administrative Specialist II to serve as clerical support for registration database
- Seven (7) Code Officer III to conduct inspections; day shift, Monday Friday
  - Review enforcement system to locate violations for illegal land use, noise, and other regulations at unregistered/illegal locations
  - Respond to complaints
  - Registered STR Enforcement Code Compliance will investigate, confirm violation, contact local responsible party, and issue notices/citations as necessary. Revoke registration of repeat offenders.
  - Unregistered STR Enforcement Code Compliance will investigate, confirm illegal land use violation, issue notices/citations as necessary. Refer loud noise complaints/disorderly conduct to DPD.
  - Based on an estimated 95% of STRs being in residential zoned areas





## Staffing

#### Reject or modify CPC Recommendations (Presumed 3,000 STRs)

- One (1) Manager to oversee operations of STR Registration program
- One (2) Supervisor for scheduling and registration program management
- One (1) Administrative Specialist II to serve as clerical support for registration database
- 14 Code Officers will be needed for registration, inspection and enforcement program, based on:
  - One initial annual inspection; reinspection as needed
  - Review enforcement system to locate violations for illegal land use, noise, and other regulations at unregistered/illegal locations
  - Respond to complaints
  - Includes day and evening shifts with coverage until 2:00 am on the weekends





## Staffing

#### Reject or modify CPC Recommendations (Presumed 6,000 STRs)

- One (1) Manager to oversee operations of STR Registration program
- One (4) Supervisor for scheduling and registration program management
- One (2) Administrative Specialist II to serve as clerical support for registration database
- 28 Code Officers (30 for 24-hr model) will be needed for registration, inspection and enforcement program, based on:
  - One initial annual inspection; reinspection as needed
  - Review enforcement system to locate violations for illegal land use, noise, and other regulations at unregistered/illegal locations
  - Respond to complaints
  - Includes day and evening shifts with coverage until 2:00 am (or all hours) on the weekends







## Technology

- Registration software capable of online application and payment; case and inspection management
  - Created registration database Anticipated to be operational pending PCI approval
  - Partnering with ITS and current vendor to finalize program
- Compliance Activity & Enforcement software to aid CCS staff with platform and host compliance:
  - Address identification: Monitoring hosting platforms; produce activity dashboard and map to monitor trends, etc.
  - **Compliance monitoring:** Up-to-date information for each identified rental unit and its compliance status; capable of sending letters to noncompliant properties 24/7; Monitor properties that become compliant after letter of enforcement
  - Density management: Track STR locations to ensure compliance with distance requirements



## Technology

- Compliance Activity & Enforcement Software benefits:
  - Monitoring & Reporting
    - Establish baseline of STRs in Dallas
    - Real-time reporting of all new listings and daily calendar monitoring
    - Identify future bookings as they are made on the rental platform
    - Automatic identification of violations
  - Constituent Portal
    - Public-facing portal linked to CCS website
    - Permit data and responsible party contact information for STR property







#### Funding

3

|                          | Accept CPC Recommendation (As total of 150 STRs)   | ssumed stock | Reject CPC Recommendation (Assumed stock of 3,000 STRs)  |             |  |
|--------------------------|--|--------------|--|-------------|--|
| Staffing                 | -Supervisor<br>-Admin Specialist II<br>-7 Code Officer III   | \$666,872    | -Manager, 2 Supervisor<br>-Admin Specialist II<br>-7 Code Officer III<br>-7 Code Officer II                        | \$1,328,752 |  |
| Equipment                | Vehicles, uniforms, safety equipment   | \$488,523    | Vehicles, uniforms, safety equipment   | \$1,051,406 |  |
| Training                 | Code Academy, safety training, self-<br>defense  | \$45,683     | Code Academy, safety training, self-defense  | \$110,513   |  |
| Technology               | Registration Software Enhancement –<br>one time set up cost (\$150K)<br>Enforcement Software –<br>Ongoing (\$192k) | \$342,000    | Registration Software Enhancement – one<br>time set up cost (\$150K)<br>Enforcement Software –<br>Ongoing (\$192k) | \$342,000   |  |
| Annual Fee               | Annual Registration Fee  | \$248        | Annual Registration Fee  | \$404       |  |
| <b>Re-Inspection Fee</b> | Re-Inspection Fee  | \$144        | Re-Inspection Fee  | \$234       |  |
| Total Expense            | (annual expense after one time costs: \$602,420)   | \$1,543,079  | (annual expense after one time costs: \$1,721,279)   | \$2,823,671 |  |
| Estimated Revenue        |  | \$48,001     |  | \$1,562,631 |  |



#### Funding

|                          | Reject CPC Recommendation (Assum<br>of 6,000 STRs)   | ned stock   | Reject CPC Recommendation (Assumed Stock<br>of 6,000 STRs) – 24hrs Wed-Sun   |             |  |
|--------------------------|--|-------------|--|-------------|--|
| Staffing                 | -Manager, 4 Supervisors<br>-2 Admin Specialist II<br>-14 Code Officer III<br>-14 Code Officer II                   | \$2,557,682 | -Manager, 4 Supervisors<br>-2 Admin Specialist II<br>-14 Code Officer III<br>-16 Code Officer II                   | \$2,723,378 |  |
| Equipment                | Vehicles, uniforms, safety equipment   | \$1,932,676 | Vehicles, uniforms, safety equipment   | \$2,171,189 |  |
| Training                 | Code Academy, safety training, self-defense  | \$217,067   | Code Academy, safety training, self-defense  | \$226,642   |  |
| Technology               | Registration Software Enhancement – one<br>time set up cost (\$150K)<br>Enforcement Software –<br>Ongoing (\$192k) | \$342,000   | Registration Software Enhancement – one<br>time set up cost (\$150K)<br>Enforcement Software –<br>Ongoing (\$192k) | \$342,000   |  |
| Annual Fee               | Annual Registration Fee  | \$424       | Annual Registration Fee  | \$464       |  |
| <b>Re-Inspection Fee</b> | Re-Inspection Fee  | \$248       | Re-Inspection Fee  | \$265       |  |
| Total Expense            | (annual expense after one time costs: \$3,146,297)   | \$5,049,425 | (annual expense after one time costs: \$3,333,871)   | \$5,463,209 |  |
| Estimated Revenue        |  | \$3,285,702 |  | \$3,580,959 |  |



## **Outreach and Engagement**



Following adoption of zoning and registration ordinances, Code Compliance will conduct outreach efforts to include:

- Communications team collaboration
- Social media broadcast
- Stakeholder community meetings
- City Council newsletters
- Mailers to currently registered operators
- Advertise on our Code Compliance website



# City of Dallas

## Short-Term Rental Zoning and Registration Ordinances

# City Council briefing April 4, 2023

Andreea Udrea, PhD, AICP Assistant Director Planning and Urban Design

Chris Christian, Director Code Compliance Services

Jeremy Reed, Assistant Director Code Compliance Services <sub>63</sub>



## Quality of Life Request – HB 2665

- Bill prohibits a local government from adopting or enforcing a local law that :
  - Expressly or effectively prohibits the use of a property as an STR,
  - Regulates the duration or frequency of use of a property as an STR, or
  - Limits the number of occupants in an STR.





- Quality of Life Request HB 2665 Cont.
  - Bill authorizes a local government to adopt and enforce a local law that requires the owner or operator of an STR to:
    - Register the property as an STR,
    - Obtain all required tax registrations, receipts, or certificates,
    - Update registration information when the information changes,
    - Comply with parking, noise, and solid waste requirements, and
    - Designate and maintain at all times a local responsible party.





#### Short-term Rental Survey – Texas Cities

| City  | Arlington                     | Austin  | Carrollton  | Dallas                                    | Fort Worth  | Frisco                             | Garland   | San Antonio  |
|---|-------------------------------|---|---|---|---|------------------------------------|---|--|
| Population  | 392,786                       | 964,177   | 135,834   | 1,400,000                                 | 874,401   | 225,060                            | 250,000   | 1,434,625  |
| Number of<br>Registered STRs  | 190                           | 2,053   | 250-300   | 1,735<br>paying HOT                       | 120 operating in zones<br>that are legal; about 800<br>discovered after using<br>enforcement software | 148 permitted                      | N/A   | As of the end of fiscal year 2022<br>a total of 3,345 active STRs.   |
| What, if any, are<br>the challenges<br>with<br>enforcement?   | Being present at<br>complaint | Identifying<br>violations                               | Identifying Air<br>B&Bs   | No ordinance to<br>enforce                | Complaint driven /<br>reactive approach   | Haven't ran in to<br>any as of yet | Timing of complaints after<br>normal business hours,<br>trying to determine the<br>occupancy count of who is<br>staying vs visiting,<br>contacting owners | Code enforcement team is<br>reactive when it comes to STRs.<br>We receive the complaints,<br>conduct research, and then send<br>out a code officer to issues<br>citations. |
| Do you collect<br>HOT for STRs?   | Yes                           | Yes   | No, but will be   | Yes                                       | Yes   | Yes                                | Yes   | Yes  |
| Do you receive a<br>registration fee? If<br>so, how much and<br>how often is it<br>collected?         | \$500 application<br>fee      | \$733.80<br>application<br>fee and \$412<br>renewal fee | \$250/yr.   | Anticipate<br>regulating in the<br>future | \$150/yr.<br>\$100 annual renewal fee   | \$300/yr.                          | \$200/yr.   | \$100/ 3 yrs.  |
| Since implementing<br>your STR<br>regulations, how<br>have your<br>enforcement efforts<br>been going? | N/A                           | N/A   | Enforcement to<br>start January<br>2024. Going<br>through admin<br>process. | N/A                                       | Not easy to enforce, but<br>not overwhelmed with<br>people reporting                                  | No issues                          | N/A   | N/A<br>66  |



|   | Short-term Rental Survey – Texas Cities  |  |  |   |  |   |  |  |  |  |  |
|---|--|--|--|---|--|---|--|--|--|--|--|
| City  | Arlington  | Austin   | Carrollton                                       | Dallas  | Fort Worth   | Frisco                                  | Garland  | San Antonio  |  |  |  |
| Is the STR<br>registration fee<br>based on cost<br>recovery for the<br>city?  | Registration fee is based on the<br>time required for staff to review<br>and process applications as well<br>as perform code inspections and<br>re-inspections. The STR permits<br>bring in roughly \$8K per year<br>which is shy of total expenses.<br>However, the STR staff's time is<br>split to support other<br>departments. | Our fees are set at<br>100% cost recovery for<br>administering the<br>licensing program. |  | Dallas: fee<br>study aimed at<br>cost recovery. | N/A  | N/A                                     | N/A  | A taskforce (individuals from<br>neighborhoods, stakeholders, STR<br>hosts) proposed the \$100 application<br>fee. This was presented to city council<br>with the proposed ordinance and was<br>approved by council. |  |  |  |
| Any limits on the<br>number STRs within<br>an area?   | No   | Single family, No. Multi<br>family, yes.   | No   | No  | N/A  | No                                      | No   | Type 1 STRs (owner occupied) are<br>unlimited in block face. Type 2 STRs<br>(non-owner occupied) is limited to<br>12.5% of block face.   |  |  |  |
| Any limits as to<br>where STRs are<br>allowed?  | Yes, none allowed in residential zones   | No   | Yes. STRs are<br>not allowed in<br>Multi-family. | No  | Yes, none<br>allowed in<br>residential<br>zones                                  | Yes, not<br>near<br>industrial<br>zones | You cannot<br>have any STRs<br>in commercial<br>business zones | STRs are not allowed in: C-3 General<br>Commercial District and all industrial<br>districts.   |  |  |  |
| If STRs are<br>permitted, is an<br>emergency contact,<br>rules of behavior,<br>and ordinance for<br>STR guests<br>required? | Yes  | Yes  | Yes  | No  | Yes, designation<br>of local<br>responsible<br>party, host rules<br>is required. | Yes                                     | Yes  | Yes, When permit is issued, a 24 hour<br>designated operator is listed for<br>emergencies/complaints. They are<br>required to make this information<br>available to guests.<br>67                                    |  |  |  |



#### Short-term Rental Survey – Texas Cities

| City   | Arlington | Austin | Carrollton                   | Dallas | Fort Worth   | Frisco | Garland  | San Antonio   |
|--|-----------|--------|------------------------------|--------|--|--------|--|---|
| Do you require<br>license/permit/regis<br>tration numbers on<br>the listing? Have<br>platforms removed<br>unregistered STRs? | No        | N/A    | N/A                          | No     | Yes, registration<br>number must<br>be included on<br>listing. | Yes    | No   | Yes, they are required to list their<br>STR permit number on their<br>listing. Platforms will not remove<br>unpermitted postings. |
| Do Hosting<br>platforms have to<br>register with the<br>city?  | No        | N/A    | N/A                          | No     | No   | No     | No   | No  |
| If yes, how do you<br>enforce this?  | N/A       | N/A    | N/A                          | N/A    | N/A  | N/A    | N/A  | N/A   |
| Do you require<br>hosting platforms to<br>require city<br>registration number<br>prior to listing?                           | No        | N/A    | N/A                          | No     | N/A  | No     | No   | Limited enforcement: (we cannot<br>compel AirBnB to require their<br>hosts to provide this).                                      |
| How do you enforce<br>or plan to enforce<br>the noise<br>restrictions?   | P.D.      | N/A    | P.D. also noted in ordinance | N/A    | N/A  | N/A    | P.D. responds to calls for service, then<br>assess and holds the property owner<br>or violator liable. Working well so far |   |



#### Short-term Rental Survey – Cities Outside Texas (Including Dallas)

| City  | Atlanta   | Boston   | Dallas                     | San Francisco   | Santa Monica  |
|---|---|--|----------------------------|---|---|
| Population  | 498,700   | 654,776  | 1,400,000                  | ~825,000  | 91,105  |
| Number of Registered STRs                             | 1,115 STR licenses issued as<br>of March 2022. Cannot<br>provide you with an accurate<br>number. However, Granicus<br>and other short-term rental<br>compliance companies have<br>stated that there are<br>approximately 8K to 10k<br>STRs. We are under the<br>impression that this number<br>incudes Metro Atlanta and<br>not just City of Atlanta. | Currently have 904 active<br>Short Term Rental licenses<br>in the City of Boston | 1,735 paying HOT           | N/A   | 175   |
| What, if any, are the challenges<br>with enforcement? | We anticipate issues of<br>keeping track of illegal<br>listings that have not<br>obtained a STRL. We would<br>not have the man power to<br>search platforms and<br>compare applications.  | N/A  | No ordinance<br>to Enforce | Staffing shortages; certain STR<br>hosts are discovering the<br>loophole in the SF regulatory<br>scheme i.e. hosts are listing<br>unhosted stays as hosted and<br>it's difficult to classify stays as<br>hosted (no limit) or unhosted<br>(limit of 90) | responsible for all STR and medium-term<br>violation complaints. There are over<br>16,000 listings across numerous platforms<br>in the city. We do not have the staff nor<br>the time to stay on top of this. Hope to |



#### Short-term Rental Survey – Cities Outside Texas (Including Dallas)

| City  | Atlanta   | Boston  | Dallas                                 | San Francisco  | Santa Monica  |
|---|---|---|--|--|---|
| Do you collect HOT for STR?   | Yes   | N/A   | Yes                                    | The SF Office of the Tax<br>Collector collects the HOT<br>from hosts; the OSTR assures<br>that hosts have a business<br>registration indicating they<br>owe HOT; AirBnB actually<br>remits HOT for their users | Yes; Transient Occupancy Tax  |
| Do you receive a registration fee? If<br>so, how much and how often is it<br>collected? | \$150/year<br>NOTE: \$150- Nonrefundable<br>Payment is required at time<br>of submittal of application.<br>Primary residence and one<br>additional dwelling unit =<br>\$150 | The fees for Short Term<br>Rental are as follows:<br>\$200 annually for Home<br>Share and Owner Adjacent<br>units<br>\$25 annually for Limited<br>Share Units | Anticipate regulating in<br>the future | \$550; collected at application<br>and at application renewal<br>(every 2 years)   | Initial Home Share Applications are<br>\$298.28 (first year) and renewal<br>applications \$100/annually. If an applicant<br>closes their home share license, they will<br>have to apply for the initial application<br>again. |



| Short-term Rental Survey – Cities Outside Texas (Including Dallas)  |  |        |        |   |   |  |  |
|---|--|--------|--------|---|---|--|--|
| City  | Atlanta  | Boston | Dallas | San Francisco   | Santa Monica  |  |  |
| Is the STR registration fee based on<br>cost recovery for the city? | Unsure of how the fee was<br>determined or if a fee study<br>was done. City<br>Councilmembers created the<br>Ordinance.                                    | N/A    |        | The fee is supposed to cover<br>the cost of the<br>program. However, at the<br>program's inception the fee<br>was set only at \$50 as a<br>means to incentivize<br>individuals conducting short-<br>term rentals to seek permits<br>and legalize their<br>operations. The fee was<br>raised to \$250, then to \$450,<br>and finally last year to \$550 to<br>get closer to cost<br>recovery. Fee is anticipated to<br>be raised in July 2023 to get<br>closer to cost recovery. The<br>two-year term was decided by<br>the SF legislators also at<br>program inception. | based on cost recovery. On July 1st, the<br>fees will increase approximately 4% over<br>current fees. |  |  |
| Any limits on the number STRs<br>within an area?                    | Currently, no. There is an<br>amended ordinance that<br>may be introduced if passed<br>that will limit how many in<br>an area or multi-family<br>building. | N/A    | No     | No limit on the number of<br>STRs   | No<br>71  |  |  |



| Short-term Rental Survey – Cities Outside Texas (Including Dallas)   |  |   |        |   |   |  |  |  |
|--|--|---|--------|---|---|--|--|--|
| City   | Atlanta  | Boston  | Dallas | San Francisco   | Santa Monica  |  |  |  |
| Any limits as to where STRs are allowed?   | Currently, no. There is an<br>amended ordinance that may<br>be introduced if passed<br>where STRs are allowed.                                 | No  | No     | There are properties in SF that<br>are controlled or owned by either<br>the Federal Government or the<br>SF Port which are not allowed to<br>have STRs                                  | No  |  |  |  |
| If STRs are permitted, is an<br>emergency contact, rules of<br>behavior, and ordinance for STR<br>guests required?           | Yes, must notify neighbors,<br>must have a 24 hour STR<br>Agent. Must have required<br>rules posted.   | Yes, local contact must<br>respond within two (2)<br>hours.   | No     | The regulations do not require an emergency contact   | STRs are not allowed.   |  |  |  |
| Do you require<br>license/permit/registration<br>numbers on the listing? Have the<br>platforms removed unregistered<br>STRs? | Yes, STRL number must be<br>listed on the listing. Airbnb<br>has created an area for host<br>to put the number.                                | N/A   | No     | Yes- we ask that each listing have<br>either a record number for the<br>application or the certificate<br>number given to approved<br>applications                                      | Yes, we require the City of Santa Monica<br>home share permit number on the listing |  |  |  |
| Do Hosting platforms have to register with the city?   | They do not have to register<br>to my office. However, they<br>must be registered to the<br>Office of Revenue so they<br>can send tax payments | Booking agents enter into<br>agreement with city to<br>assist with enforcing the<br>ordinance to include<br>removing ineligible listings. | No     | SF requires that hosting platforms<br>comply with the regulations,<br>which entails sending the OSTR<br>monthly lists of the listings on<br>their websites; there is no fee for<br>this | No<br>72  |  |  |  |



| Short-term Rental Survey – Cities Outside Texas (Including Dallas)                              |   |   |        |  |  |
|---|---|---|--------|--|--|
| City  | Atlanta   | Boston  | Dallas | San Francisco  | Santa Monica   |
| If yes, how do you enforce<br>this?   | N/A   | Airbnb is the largest<br>booking agent and<br>they have an<br>agreement with the<br>city. | N/A    | In SF the two largest hosting platforms are AirBnB and<br>VRBO. Combined they have more than 9 out of 10<br>listings in SF. Because those platforms and the City of SF<br>were part of a federal settlement agreement over the<br>legality of a City ordinance, OSTR always receives the<br>monthly correspondence from these two hosting<br>platforms. OSTR is currently working on getting other<br>minor hosting platforms to provide the monthly<br>correspondence. To date we have been successful in<br>getting those platforms to comply. If OSTR encounters a<br>hosting platform that does not comply that OSTR will<br>seek to use its enforcement and administrative penalty<br>powers (these are in SF Admin Code Chapter 41A ). | N/A  |
| Do you require hosting<br>platforms to require city<br>registration number prior to<br>listing? | Airbnb has their own<br>guidelines on how<br>they handle host that<br>will list. We do not<br>regulate how they<br>handle listings              | Booking agents who<br>accept a fee for an<br>ineligible STR may be<br>subject to a fine   | No     | SF requires that listings are identified either by their<br>application number or their certificate number   | Yes. Hosts are aware of the City of Santa<br>Monica's six digit permit numbers and will<br>make up a number which may or may not<br>be linked to a valid business license<br>number. |
| How do you enforce or plan to<br>enforce the noise restrictions?                                | City of Atlanta has a<br>noise ordinance that<br>host and guest must<br>abided by. Atlanta<br>Police Department<br>handles noise<br>complaints. | Enter into an<br>agreement with<br>booking agent.   | N/A    | The Police and the Dept of Public Health enforce the SF<br>Noise Ordinance   | We investigate noise complaints and<br>remind the hosts that they must comply<br>with home share ordinance rules or be<br>subject to administrative citations and<br>fines.<br>73    |

# An Analysis of the Impact of Short-Term Rentals on Public-Safety and Nuisance Calls

The following document is a data analysis white paper prepared by the Office of Data Analytics and Business Intelligence at the City of Dallas published June 5, 2023.



## Abstract

The purpose of this white paper is to provide a detailed walk-through of the updated and expanded analyses undertaken to better understand the public-safety and nuisance-related impact of short-term rentals (STRs) in the City of Dallas. Using data from the City's 311 and 911 systems and matching them with available STR addresses, we compared calls generated by STRs and non-STRs. This study finds differences between STR and non-STR residential properties. This difference constitutes less than one call in the analysis period.

# **Executive Summary**

The analysis below expands our prior study by increasing the number of calls analyzed from 8 to 103 call types from our 911 and 311 systems, organized into 42 call type categories (for example: gun-shot wound call type categories includes codes: GS – Gun Shot Wound, \*A – Gun Shot Wound and DELTA – Gun Shot Wound). This analysis includes a total number of 2,399 STRs being utilized in which we analyzed 103 different call types. The other way in which this study is different is that we have shortened the analysis window. The study period is a period of approximately four months from January 1, 2023, to April 29, 2023. This was done to increase likelihood of the addresses being used as STRs during the time the call was generated. The list of current residential STRs was compiled in May 2023.

A summary of the key findings of this data analysis is listed below.

- The number of call types included in this analysis is 103 compared to the 8 call types in the original analysis.
- 1,907 (80%) of residential STRs generated zero calls for the 103 call types analyzed in this paper.
- Residential STRs had a higher number of calls associated with their addresses than non-STR properties, however this difference is less than one call on average per property. During this time period, 311 and 911 received over 1 million calls<sup>1</sup>.
- 95 (4%) residential STRs generated 3 or more calls and were considered outliers<sup>2</sup>.
- DBI was able to identify 147 additional residential STR addresses beyond GovOS. Of the 3,079 listings DBI researched, this constitutes about 5% of all possible listings as estimated by internet sources<sup>3</sup>.
- Residential STR properties represent less than one percent (0.82%) of the City's total residential properties as defined by the Dallas, Collin, and Denton Counties' Central Appraisal Districts<sup>4</sup>.

<sup>&</sup>lt;sup>1</sup> The above result is predicated on the assumption that every call to that address is in the response to a problem at that address. It further assumes that the property in question was being rented out as an STR at the time of the call. The data does not allow us to verify this. Our analysis is conservative, in that we have assumed maximum impact. We know that we are providing an overestimate and urge caution with any interpretation.

<sup>&</sup>lt;sup>2</sup> This study defines an outlier as the product of 1.5 the interquartile range value above the third quartile.

<sup>&</sup>lt;sup>3</sup> Inside Airbnb: <u>http://insideairbnb.com/</u>

<sup>&</sup>lt;sup>4</sup> Residential properties refer to all properties identified as residential by the Dallas, Collin and Denton Counties' Appraisal Districts.

## Background

In May 2021, the Office of Data Analytics and Business Intelligence published an analysis on Short-Term Rental (STR) properties in the City of Dallas<sup>5</sup>. The first impact analysis in that paper was to test the assertion that STR properties resulted in increased 311 and 911 nuisance related complaints as compared to non-STR properties. Our findings from that analysis showed that STRs and non-STRs showed an observed difference of one call per year. In November 2022, DBI published an update to the original analysis (Appendix B)<sup>5</sup>. The update included a reiteration of impact analysis 1 (May 2021 analysis) using more recent data to see the difference in 911 and 311 calls between STR and non-STR properties. The original analysis in 2021 and 2022 had similar conclusions.

In April 2023, City Council had further questions on STR data analysis and thus DBI conducted an additional study analyzing several additional call types pertaining to public-safety and nuisance-related issues. The goal of this analysis was to find out if residential STRs generated more calls than non-STR properties, like the impact analysis 1 in the 2021 STR analysis, using the same methodology. DBI worked with Dallas Police Department (DPD), Dallas Fire Rescue Department (DFR), 311 and Code Compliance Departments (CCS) to identify relevant call types for the analysis. Relevant call type data were collected from 911, the Dallas Online Reporting System and 311 systems. For this analysis, DBI also explored finding additional residential STR addresses outside the address list provided by GovOS (previously known as MUNIRevs).

Call data for this analysis was collected from January 1, 2023, to April 29, 2023, to increase the likelihood of the addresses being used as STRs at the time the call was generated<sup>6</sup>.

## Methods

## Selection of Call types

DBI's first iteration of this analysis focused on nuisance-related calls that were evaluated and selected upon recommendation of the STR Task Force. Upon subsequent council briefings, DBI received feedback that the scope should include public-safety related calls potentially associated with STR properties. Therefore, to represent the potential impacts of an STR in a neighborhood and on City of Dallas resources, DBI approached Dallas Police Department (DPD), Dallas Fire Rescue (DFR) department, 311 and the Code Compliance Department (CCS) and jointly identified and recommended calls for this analysis. Public-safety and nuisance call types were recommended by subject matter experts from each represented department who were asked to select call types which were most relevant in identifying a residential STR property as a potential nuisance or public-safety risk. An exhaustive list of call categories and specific call codes can be found in Appendix A1 of this document.

<sup>&</sup>lt;sup>5</sup> STR White Paper Analysis including Appendix B: <u>https://dallascityhall.com/government/citymanager/Documents/FY%2022-</u> 23%20Memos/Short%20Term%20Rental%20Impact%20Analysis%20Update.pdf

<sup>&</sup>lt;sup>6</sup> Due to the ransomware attack on City of Dallas's network, servers, and computers, it was not possible to include data beyond April 29, 2023.

#### Data Collection

Data for this analysis comes from multiple sources and was compiled and analyzed in R<sup>7</sup>. The data from 911 calls came from the Response Master Incident table of the City's Computer Aided Dispatch (CAD) system. Additional 911 calls were extracted from the Dallas Online Reporting System (DORS)<sup>8</sup>, which allows residents to submit non-emergency related reports online. The 311 Service Call data came from Customer Relationship Management (CRM) Service Requests data (CASE2 table). Residential STR data was collected from two sources, GovOS<sup>9</sup>, a third-party vendor that the City uses to identify and register STR properties as well as Inside Airbnb data<sup>10</sup>, which is generated by web scraping the Airbnb, Inc.<sup>11</sup> platform. To identify residential properties throughout the City, DBI used data from Dallas, Collin, and Denton Counties' Central Appraisal Districts. DBI excluded commercial, and therefore excluded any multi-family properties classified as commercial, and specifically focused on residential properties as identified by the Central Appraisal Districts. The purpose of this exclusion is to relate calls for service received by 311 or 911 to a physical address. The capturing of unit numbers for some multi-family properties in the call data is inconsistent and not reconcilable.

## Address Reconciliation

One of the criticisms received on the prior STR impact analysis was that the analysis only used GovOS addresses. The concern expressed was that GovOS only listed some, but not all of the total STRs that are operating in the City. In an attempt to ensure all STRs operating in the City of Dallas were included in our analysis, the City of Dallas had exploratory conversations with multiple vendors identifying scope and availability given our time frame, none were willing to engage.

During past STR related briefings and presentations, several online platforms were named by the City's Zoning Ordinance Advisory Committee (ZOAC), and the City Planning Commission (CPC) and City Council as alternative STR address sources. One such source that was often referenced was Inside Airbnb<sup>10</sup>. Inside Airbnb reports to scrub data from Airbnb, Inc. and provides a tentative list of STRs for the City of Dallas on their website. Since tentative listings from Inside Airbnb do not provide street addresses or accurate coordinates (latitude and longitude or other geographical data), this data cannot be directly used to collect STR addresses. The coordinates are anonymized by the listing's host by a radius of 0-450 feet from the actual address<sup>10</sup>.

DBI deployed 14 analysts, who cumulatively spent more than 1,100 hours manually reviewing each potential residential STR listing. To identify the Inside Airbnb listings' physical addresses, DBI staff manually reviewed photographs from each listing and verified the property's address using a variety of online tools such as Google Maps, Google Lens, Zillow.com, and Realtor.com, alongside applications generated by DBI's Geographic Information Systems (GIS) team.

Out of 5,733 property listings in Inside Airbnb, DBI was able to find 147 new residential STR addresses that were not included by GovOS and which were a match with Appraisal District's residential parcels. DBI has included these 147 new addresses in this analysis and has sent these addresses to the City

<sup>&</sup>lt;sup>7</sup> The R Project for Statistical Computing: <u>https://www.r-project.org/about.html</u>

<sup>&</sup>lt;sup>8</sup> Dallas Online Reporting System: <u>https://dallaspolice.net/reports/Pages/coplogic.aspx</u>

<sup>&</sup>lt;sup>9</sup> GovOS: <u>https://govos.com/munirevs-acquisition/</u>

<sup>&</sup>lt;sup>10</sup> Inside Airbnb: <u>http://insideairbnb.com/</u>

<sup>&</sup>lt;sup>11</sup> Airbnb: <u>https://www.airbnb.com/</u>

Controller's Office (CCO) for further verification. The STR data from GovOS was extracted on April 01, 2023, and Inside Airbnb data was extracted on March 07, 2023.

## Analytical Strategy

To prepare the data for analysis a few key things had to be done. The first challenge was to geolocate each STR. Longitude and Latitude were added to each address so that STRs could be plotted on the map as a spatial feature for further spatial analysis. Using the City's authoritative composite address locator, the STR dataset was geocoded and spatially mapped. The locator index used attempts to match the address to a tax account address so that the resulting location intersects the corresponding tax parcel and can be associated with a tax appraisal account. Where this was not possible, staff geocoded the location to the street using an approximate location.

## 311 and 911 Complaints

DBI staff extracted records of 311 and 911 calls made to the City of Dallas between January 01, 2023, to April 29, 2023 (See Table 3). Staff matched STR property addresses collected from GovOS and Inside Airbnb with addresses reported in the 311 and 911 call tables to identify calls that were associated with STR addresses. All the remaining 311 and 911 addresses were classified as non-STRs. Thereafter, staff collected residential addresses for the entire City of Dallas<sup>12</sup>. These residential addresses were further matched with the previously identified STR and non-STR addresses to only focus this analysis on residential addresses and eliminate commercial addresses.

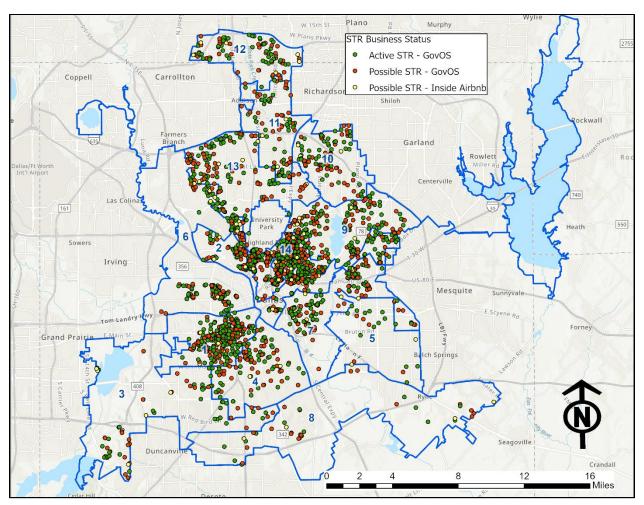
## Results

## Residential STR Properties Throughout the City of Dallas

Figure 1 demonstrates the spatial distribution of residential STRs throughout the City of Dallas overlayed on a map. Council boundaries are displayed within the figure and residential STR addresses are color coded based off the business status of the property. As per City Controller's Office (CCO) a business status of "Active and Registered" refers to properties that are registered with the City and are paying hotel occupancy taxes (HOT). A business status of "Possible Short-Term Rental" refers to properties that GovOS has identified as possibly being a Short-Term Rental, but they are not registered with the City, not paying HOT and their status as a STR has not been confirmed. An additional subset of residential STRs identified in Inside Airbnb that were not in the GovOS data were considered un-registered properties and thus classified as "Possible Short-Term Rental" properties.

<sup>&</sup>lt;sup>12</sup> Source: Dallas County, Collin County, and Denton County Appraisal Districts

#### Figure 1: STR Rental Locations



Source: STR data was extracted from GovOS on April 01, 2023, and Inside Airbnb as of March 07, 2023. Addresses were geolocated using the City's authoritative geolocating service and spatially plotted on a map.

The frequency of residential STRs by City of Dallas Council Districts is demonstrated in Table 1. The Council District with the highest frequency of STRs is Council District 14 followed by Council Districts 2 and 1, respectively.

| Council District         | Count (n) |  |
|--------------------------|-----------|--|
| 1                        | 341       |  |
| 2                        | 386       |  |
| 3                        | 70        |  |
| 4                        | 113       |  |
| 5                        | 19        |  |
| 6                        | 158       |  |
| 7                        | 160       |  |
| 8                        | 41        |  |
| 9                        | 166       |  |
| 10                       | 100       |  |
| 11                       | 92        |  |
| 12                       | 105       |  |
| 13                       | 160       |  |
| 14                       | 488       |  |
| Total Number of STRs (n) | 2,399     |  |

### Table 1: Frequency of STRs by City of Dallas Council Districts January 2023 to April 2023

Source: Short-Term Rental data comes from both GovOS (maintained by the City Controller, extracted on April 01, 2023) and Inside Airbnb data (extracted on March 07, 2023).

The number of residential STRs in the City of Dallas can be seen in Table 2. As of April 01, 2023, there were 1,257 Active and Registered residential STRs. As of April 01, 2023, there were 995 "Possible Short-Term Rentals". As of March 07, 2023, there were 147 "Possible Short-Term Rentals" identified in Inside Airbnb data. The final number of residential STRs used in this analysis was 2,399 total addresses as identified in GovOS and Inside Airbnb data.

# Table 2: Frequency of STR Properties by City Controller's Office StatusJanuary 2023 to April 2023

| Variable                                   | Count |
|--|-------|
| Short-Term Rental Properties               |       |
| Active & Registered                        | 1,257 |
| Possible Short-Term Rental (GovOS)         | 995   |
| Possible Short-Term Rental (Inside Airbnb) | 147   |
| Total Number of STRs (n)                   | 2,399 |

Source: Short-Term Rental data comes from both GovOS (maintained by the City Controller, extracted on April 01, 2023) and Inside Airbnb data (extracted on March 07, 2023).

#### Descriptive Statistics

Table 3 shows the frequencies of 911 and 311 calls for service from January 01, 2023, to April 29, 2023. The most numerous 311 call type in this data is the "Parking – Report a Violation – TRN" concern type with 4,495 reported calls. Major disturbance is the most frequent 911 call type that police received with 8,168 calls observed. Aggravated assaults are the most frequent 911 call type that the fire department received with 708 calls observed.

| Variable   | STR | Non-STR | Total Calls |
|--|-----|---------|-------------|
| 311/Code Concerns Service Call Type*               |     |         |             |
| Code Concern (Bulky Trash) - CCS                   | 38  | 2,718   | 2,756       |
| Code Concern (High Weeds) - CCS                    | 57  | 3,806   | 3,863       |
| Code Concern (Litter) - CCS                        | 66  | 3,311   | 3,377       |
| Code Concern (Outside Storage) - CCS               | 10  | 1,530   | 1,540       |
| Code Concern (Parking on Unapproved Surface) - CCS | 8   | 1,376   | 1,384       |
| Code Concern (Illegal Land Use) - CCS              | 16  | 348     | 364         |
| Code Concern (Noise Complaint) - CCS               | 17  | 260     | 277         |
| Code Concern (Dangerous Condition) - CCS           | 4   | 158     | 162         |
| Code Concern (Illegal Garbage Placement) - CCS     | 0   | 21      | 22          |
| Parking – Report a Violation -TRN                  | 124 | 4,371   | 4,495       |
| Chronic Noise Complaint – DPD                      | 18  | 562     | 580         |
| Miscellaneous Service Request – 311                | 10  | 446     | 456         |
| Extra Police Patrol – DPD                          | 8   | 390     | 398         |
| Narcotics/Vice Complaint – DPD                     | 2   | 110     | 112         |
| Criminal Activities – DPD                          | 2   | 107     | 109         |
| Street/Road Blockage – TRN                         | 1   | 51      | 52          |
| Short Term/Vacation Rental Survey – CCS            | 27  | 5       | 32          |
| Parking in Fire Lane/ Fire Hydrants – DFR          | 9   | 18      | 2           |
| Handicap Parking Violation – DPD                   | 1   | 4       | 5           |
| Total 311 Calls                                    | 418 | 19,592  | 20,010      |
| 911 Call Types (Police)                            |     |         |             |
| Major Disturbance                                  | 307 | 7,861   | 8,168       |
| Loud Music Disturbance                             | 95  | 3,132   | 3,227       |
| Theft  | 124 | 2,617   | 2,742       |
| Random Gun Fire                                    | 44  | 2,526   | 2,570       |
| Burglary   | 108 | 2,309   | 2,41        |
| Missing Person/Abductions                          | 10  | 878     | 888         |
| Criminal Mischief                                  | 26  | 411     | 43          |
| Suicide  | 9   | 245     | 254         |
| Aggravated Assault                                 | 7   | 228     | 23          |
| Blocked Roadways                                   | 1   | 169     | 170         |
| Shooting   | 3   | 113     | 110         |
| Parking Violation                                  | 1   | 91      | 92          |
| Sexual Assault                                     | 4   | 67      | 7           |
| Stabbing   | 0   | 64      | 64          |
| Prostitution                                       | 1   | 5       | Ű           |
| Total 911 (DPD) Calls                              | 740 | 20,716  | 21,450      |

## Table 3: Frequency of 911 and 311 Calls by Type in the City of Dallas January 2023 to April 2023

| Variable              | STR | Non-STR | Total Calls |
|-----------------------|-----|---------|-------------|
| 911 Call Types (Fire) |     |         |             |
| Aggravated Assault    | 18  | 690     | 708         |
| Injured Person        | 19  | 635     | 654         |
| Mental Health         | 7   | 307     | 314         |
| Overdose              | 5   | 236     | 241         |
| Gun Shot Wound        | 3   | 130     | 133         |
| Suicide               | 6   | 91      | 97          |
| Stabbing              | 0   | 52      | 52          |
| Sexual Assault        | 0   | 8       | 8           |
| Total 911 (DFR) Calls | 58  | 2,149   | 2,207       |

#### Total Calls (n)

43,673

Source: 311 service call data come from the CRM Case2 table. 911 call data comes from the Computer Aided Dispatch (CAD) Response Master Incident table and the Dallas Online Reporting System (DORS).

\* In the case of Code Concern – CCS SR Types, multiple code violations could be reported in one call, these calls are classified as 1 call and the concern type captured for that call is the first code violation listed in the data.

Table 4 gives a statistical summary of all the addresses and calls that staff analyzed to compare if the number of 311 and 911 calls made from residential STR properties are higher than calls made from non-STR properties. Observing all agencies combined, residential STRs generated on average 2.10 calls in a 4-month period compared to an average of 1.42 calls by non-STRs.

|            | January 2023 to April 2023 |               |           |     |     |             |                |  |  |  |
|------------|----------------------------|---------------|-----------|-----|-----|-------------|----------------|--|--|--|
| Call       | Property                   | Average Calls | Standard  |     |     |             | Total Distinct |  |  |  |
| Agency     | Туре                       | per Property  | Deviation | Min | Max | Total Calls | Properties     |  |  |  |
| All        |                            |               |           |     |     |             |                |  |  |  |
| Agencies   |                            |               |           |     |     |             |                |  |  |  |
| Combined   |                            |               |           |     |     |             |                |  |  |  |
|            | STR                        | 2.10          | 3.17      | 1   | 48  | 1,216       | 492            |  |  |  |
|            | Non-STR                    | 1.42          | 1.35      | 1   | 51  | 42,457      | 27,083         |  |  |  |
| 311/ Code  |                            |               |           |     |     |             |                |  |  |  |
| Concerns   |                            |               |           |     |     |             |                |  |  |  |
|            | STR                        | 1.76          | 1.87      | 1   | 22  | 418         | 237            |  |  |  |
|            | Non-STR                    | 1.37          | 1.12      | 1   | 51  | 19,592      | 14,347         |  |  |  |
| 911        |                            |               |           |     |     |             |                |  |  |  |
| (Police)   |                            |               |           |     |     |             |                |  |  |  |
|            | STR                        | 2.48          | 4.04      | 1   | 48  | 740         | 298            |  |  |  |
|            | Non-STR                    | 1.50          | 1.60      | 1   | 51  | 20,716      | 13,773         |  |  |  |
| 911 (Fire) |                            |               |           |     |     |             |                |  |  |  |
|            | STR                        | 1.32          | 0.83      | 1   | 5   | 58          | 44             |  |  |  |
|            | Non-STR                    | 1.21          | 0.70      | 1   | 9   | 2,149       | 1,772          |  |  |  |

Table 4: Descriptive Statistics for 911 and 311 Calls for Residential STRs and Non-STRs January 2023 to April 2023

Source: 311 service call data come from the CRM Case2 table. 911 call data comes from the Computer Aided Dispatch (CAD) Response Master Incident table and the Dallas Online Reporting System (DORS).

Table 5 highlights the observed difference between the number of 311 and 911 calls. On average, residential STRs generated approximately 0.39 more 311 calls than non-STR properties between January 01, 2023, and April 29, 2023. This means that, on average, residential STRs generated about the same number of service request calls to 311 than non-STRs. Residential STRs generated 0.98 more 911 calls involving the police (DPD) than non-STRs between January 01, 2023, and April 29, 2023. This means that, on average, residential STRs generated about 1 more call to 911 regarding nuisance and/or public-safety complaints. Residential STRs generated 0.11 more 911 calls involving the fire department (DFR) than non-STRs between January 01, 2023. This means that, on average, residential STRs generated 0.11 more 911 calls involving the fire department (DFR) than non-STRs between January 01, 2023. This means that, on average, residential STRs generated 0.11 more 911 calls involving the fire department (DFR) than non-STRs between January 01, 2023, and April 29, 2023. This means that, on average, residential STRs generated 0.11 more 911 calls involving the fire department (DFR) than non-STRs between January 01, 2023, and April 29, 2023. This means that, on average, residential STRs generated about the same number of calls to 911 regarding emergencies requiring DFRs response as non-STRs.

|                       | STR Average Calls Per<br>Property Over Analysis | Non-STR Average calls<br>per Property Over |                     |
|-----------------------|---|--|---------------------|
| Call Agency           | Period  | Analysis Period                            | Observed Difference |
| All Agencies Combined | 2.10  | 1.42                                       | 0.68                |
| 311/Code Concerns     | 1.76  | 1.37                                       | 0.39                |
| 911 (Police)          | 2.48  | 1.50                                       | 0.98                |
| 911 (Fire)            | 1.32  | 1.21                                       | 0.11                |

## Table 5: Observed Differences for 911 and 311 Calls for Residential STRs and Non-STRs January 2023 to April 2023

Source: 311 Service call data comes from the CRM Case2 table. 911 call data comes from the Computer Aided Dispatch (CAD) Response Master Incident table and the Dallas Online Reporting System (DORS).

As illustrated in Figure 2 below, this dataset was highly right-skewed: that is, most residential properties, both STRs and non-STRs, had one or fewer 311 and 911 service calls. There were a few properties associated with more than one call. It was observed that 95 (4%) residential STRs generated 3 or more calls to either 311 or 911 over the analysis period and were considered as outliers.

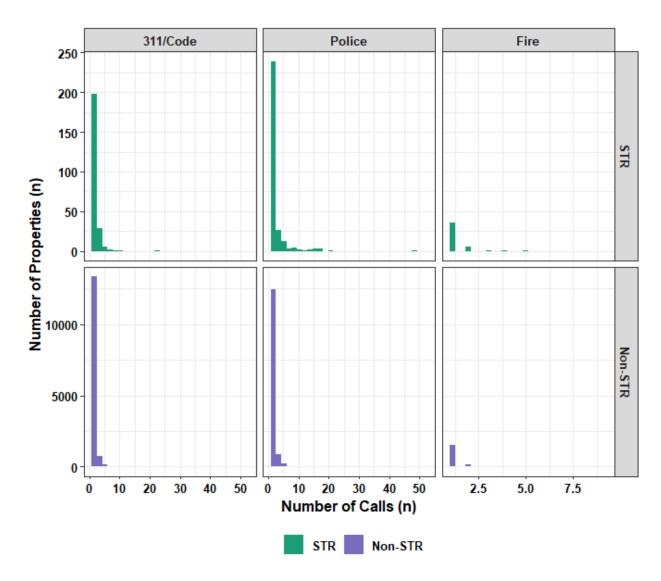


Figure 2: Distribution of Call Frequencies

Figure 2: The distribution of call frequencies is highly right-skewed where residential STRs and non-STRs generating 1 or fewer calls associated with their address. Select properties generated more than one call and were considered outliers.

## Conclusions

Using GovOS and Inside Airbnb data, staff identified 2,399 residential STRs in the City of Dallas. The number of residential STRs represent less than one percent (0.82%) of the City's total residential housing stock. 1,907 (80%) of residential STRs did not generate calls for service to 311 or 911 over the analysis period of January 01, 2023, to April 29, 2023. Most residential properties (both STR and non-STRs) with at least one call to either 311 or 911 generated only one call for service over the analysis period. Select outlier residential STRs existed and generated higher call frequencies compared to the typical residential property. Residential STRs had a higher average number of calls associated with their addresses than non-STR properties, however, this difference is less than one call. During the analysis period, 311 and 911 received over 1 million calls. On average, residential STRs generated 0.39 more calls to 311, 0.98

more calls to 911 (DPD) and 0.11 more calls to 911 (DFR) compared to non-STRs during the analysis period.

## Limitations

- This analysis assumed that every call to the address is in the response to a problem at that address and not to a neighboring address.
- This analysis assumed maximum impact of residential STRs on their surrounding communities by assuming every call related to an STR address occurred while that address was in use as an STR.
- To increase likelihood that a property was operating as an STR during the time the call was generated, this analysis limited the study to a 4-month period between the dates of January 01, 2023, to April 29, 2023. This analysis assumed that minimal changes to STR address as well as STR occupancy rates over the 4-month analysis period would occur.
- Inside Airbnb was used as a supplement to GovOS data. Because the analysis limited the study to residential STRs, it was assumed that the property type listed by the host broadly agrees with the definition of a residential property as outlined in the Central Appraisal Districts data. This assumption was used to filter Inside Airbnb data to residential type properties. After initial identification of STR properties, staff identified a subset of the addresses as residential based on the match with Appraisal Districts data.
- This analysis assumed that Inside Airbnb data is accurate, however, many inconsistencies exist. For example, Inside Airbnb listings were associated with a Dallas location but were not within the city limits. Additionally, there were 269 listings from Inside Airbnb where the link was invalid and the STR could not be identified.
- One public-safety or nuisance incident can generate more than one call and this study assumes each call coming to each department is unique in nature and thus are all included in the analysis.

## **Further Research**

This analysis has several limitations as acknowledged in the prior sections. For further research, one may consider improving confidence in attributing calls to the associated addresses. One could also attempt to ensure STRs included in the study are indeed operational as STRs during the period of data collection. Our current data does not include this information. Thereafter, analyses such as proportional significance testing, simulation of distribution of random samples for STRs and non-STRs or spatial clustering could bring forth further insights.

| Cathanan | Responding | Coll Trues  | Guntaria  | Description  |
|----------|------------|---|-----------|--|
| Category | Agency     | Call Type   | System    | Description  |
|          | Police     | 09 - Theft  | CAD       | Property stolen valued under \$2,500. Not resulting<br>from entry into a home or business. This call type<br>is responded to as a code 4 priority call.                                  |
|          | Police     | 09/01 - Theft   | CAD       | The stealing of property that is in progress, valued<br>under \$2,500. Not resulting from entry into a home<br>or business. This call type is responded to as a code<br>3 priority call. |
|          | Police     | 41/09 - Theft - In Progress   | CAD       | The stealing of property that is in progress, valued<br>under \$2,500. Not resulting from entry into a home<br>or business This call type is responded to as a code<br>2 priority call.  |
| Theft    | Police     | PSE/09 - Theft  | Expeditor | Property stolen valued under \$2,500. Not resulting<br>from entry into a home or business. This Call type<br>is responded to as a code 5 priority call.                                  |
|          | Police     | THEFT OF PROP <\$100 -<br>OTHER THAN SHOPLIFT<br>(PC 31.03(F)) (MC-<br>999999999-F151)              | DORS      | Property stolen valued under \$100. Not resulting from entry into home or business. DORS calls are responded to with no specific priority assigned.                                      |
|          | Police     | THEFT OF PROP > OR<br>EQUAL \$100 <\$750 (NOT<br>SHOPLIFT) PC31.03(e2A)<br>(MB-23990191-F183)       | DORS      | Property stolen valued under \$750. Not resulting from entry into home or business. DORS calls are responded to with no specific priority assigned.                                      |
|          | Police     | THEFT OF PROP > OR<br>EQUAL \$2,500 <\$30K<br>(NOT SHOPLIFT)<br>PC31.03(e4A) (FS-<br>23990194-F194) | DORS      | Property stolen valued under \$30,000. Not<br>resulting from entry into home or business. DORS<br>calls are responded to with no specific priority<br>assigned.                          |

Appendix A1: List of call categories as well as 311 and 911 call codes and descriptions.

311 Service call data comes from the CRM Case2 table. 911 call data comes from the Computer Aided Dispatch (CAD) Response Master Incident table and the Dallas Online Reporting System (DORS).

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| Police | THEFT OF PROP > OR<br>EQUAL \$750 <\$2,500<br>(NOT SHOPLIFT)<br>PC31.03(e3) (MA-<br>23990193-F189)  | DORS | Property stolen valued under \$2,500. Not resulting from entry into home or business. DORS calls are responded to with no specific priority assigned.                                     |
|--------|---|------|---|
| Police | THEFT OF PROP <\$2,500<br>2+PREV CONV (NOT<br>SHOPLIFT) PC31.03 (e4D)<br>(FS-23990196-F199)         | DORS | Property stolen valued under \$2,500. Not resulting from entry into home or business. DORS calls are responded to with no specific priority assigned.                                     |
| Police | THEFT OF PROP > OR<br>EQUAL \$150K <\$300K<br>(NOT SHOPLIFT)<br>PC31.03(e6A) (F2-<br>23990201-F216) | DORS | Property stolen valued under \$300,000. Not<br>resulting from entry into home or business. DORS<br>calls are responded to with no specific priority<br>assigned.                          |
| Police | THEFT OF PROP > OR<br>EQUAL \$100 <\$750 ENH<br>(NOT SHOPLIFT)<br>PC31.03(f) (MA-<br>23990204-F276) | DORS | Property stolen valued under \$750,000. Not<br>resulting from entry into home or business. DORS<br>calls are responded to with no specific priority<br>assigned.                          |
| Police | THEFT FROM BUILDING><br>OR EQUAL \$100<\$750<br>(NOT SHOPLIFT) (MB-<br>999999999-F266)              | DORS | Property stolen from residence or building valued<br>under \$750. Not resulting from entry into home or<br>business. DORS calls are responded to with no<br>specific priority assigned.   |
| Police | THEFT FROM BUILDING><br>OR EQUAL \$750<\$2500<br>(NOT SHOPLIFT) (MA-<br>999999999-F267)             | DORS | Property stolen from residence or building valued<br>under \$2,500. Not resulting from entry into home<br>or business. DORS calls are responded to with no<br>specific priority assigned. |
| Police | THEFT FROM BUILDING<br><\$100 (NOT SHOPLIFT)<br>(MC-999999999-F265)                                 | DORS | Property stolen from residence or building valued<br>under \$100. Not resulting from entry into home or<br>business. DORS calls are responded to with no<br>specific priority assigned.   |

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| Police | THEFT FROM BUILDING><br>OR EQUAL \$2500<\$30K<br>(NOT SHOPLIFT) (FS-<br>999999999-F268) | DORS      | Property stolen from residence or building valued<br>under \$30,000. Not resulting from entry into home<br>or business. DORS calls are responded to with no<br>specific priority assigned.              |
|--------|---|-----------|---|
| Police | THEFT FROM BUILDING><br>OR EQUAL \$30K<\$150K<br>(NOT SHOPLIFT) (F3-<br>999999999-F269) | DORS      | Property stolen from residence or building valued<br>under \$150,000. Not resulting from entry into<br>home or business. DORS calls are responded to<br>with no specific priority assigned.             |
| Police | THEFT FROM PERSON (PC<br>31.03(E)(4)(B)) (FS-<br>23990132-F42)                          | DORS      | Property stolen from person valued under \$2,500.<br>Not resulting from entry into home or business.<br>DORS calls are responded to with no specific<br>priority assigned.                              |
| Police | THEFT FROM PERSON-<br>PICKPOCKET(PC 31.03<br>(e)(4)(B)) (FS-23990132-<br>F102)          | DORS      | Property stolen from person as a result of<br>pickpocketing valued under \$2,500. Not resulting<br>from entry into home or business. DORS calls are<br>responded to with no specific priority assigned. |
| Police | 20 - Robbery  | CAD       | Theft of property by threat or use of force. This call type is responded to as a code 2 priority call.  |
| Police | 20R - Robbery<br>(report)+1hr   | CAD       | Theft of property by threat or use of force. This call type is responded to as a code 4 priority call.  |
| Police | ROBBERY OF INDIVIDUAL<br>(PC 29.02) (F2-12990001-<br>C2)                                | DORS      | Theft of property by threat or use of force. DORS calls are responded to with no specific priority assigned.  |
| Police | 09V-01 UUMV Just Ocrd   | CAD       | In progress theft of motor vehicle. Not resulting<br>from threat or use of force. This call type is<br>responded to as a code 3 priority call.  |
| Police | 09V - UUMV  | CAD       | Theft of motor vehicle. Not resulting from threat or<br>use of force. This call type is responded to as a code<br>4 priority call.  |
| Police | PSE/09V - UUMV  | Expeditor | Theft of motor vehicle. Not resulting from threat or<br>use of force. This call type is responded to as a code<br>5 priority call.  |

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|          | Police | 11V - Burg Motor Veh  | CAD       | Vehicle broken into without the consent of owner,<br>suspect is at the scene. This call type is responded<br>to as a code 4 priority call.   |
|----------|--------|---|-----------|--|
|          | Police | 11V/01 - Burg Motor Veh   | CAD       | Vehicle broken into without the consent of owner,<br>suspect is not at the scene. This call type is<br>responded to as a code 3 priority call.   |
|          | Police | PSE/11V - Burg Motor Veh  | Expeditor | Vehicle broken into without the consent of owner,<br>suspect is not at the scene. This call type is<br>responded to as a code 5 priority call.   |
|          | Police | BMV (PC 30.04(d)) (MA-<br>22990011-F287)                              | DORS      | Vehicle broken into without the consent of owner,<br>suspect is not at the scene. DORS calls are<br>responded to with no specific priority assigned.   |
|          | Police | 11R - Burg of Res   | CAD       | Home broken into without consent of owner,<br>suspect is not at the scene. This call type is<br>responded to as a code 3 priority call.  |
| Burglary | Police | 11R/01 - Burg Of Res  | CAD       | Home broken into without consent of owner,<br>suspect is at the scene. This call type is responded<br>to as a code 2 priority call.  |
|          | Police | 11C/01 - Burg Coin Oper   | CAD       | Any coin, debit card, credit card vending machine<br>such as soft drink, video rental machine, or snack<br>machine that has been broken into. Suspect is at<br>the scene. This call type is responded to as a code 3<br>priority call.     |
|          | Police | 11C - Burg Coin Oper  | CAD       | Any coin, debit card, credit card vending machine<br>such as soft drink, video rental machine, or snack<br>machine that has been broken into. Suspect is not<br>at the scene. This call type is responded to as a<br>code 3 priority call. |
|          | Police | BURGLARY OF A COIN<br>OPERATED MACHINE (PC<br>30.03) (MA-22990005-F2) | DORS      | Any coin, debit card, credit card vending machine<br>such as soft drink, video rental machine, or snack<br>machine that has been broken into. Suspect is not   |

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|                    |        |   |      | at the scene. DORS calls are responded to with no specific priority assigned.   |
|--------------------|--------|---|------|---|
|                    | Police | BURGLARY OF BUILDING -<br>NO FORCED ENTRY (PC<br>30.02 ( C) (1)) (FS-<br>22990001-E2) | DORS | Home or building such as a shed broken into<br>without consent of owner, suspect is not at the<br>scene. DORS calls are responded to with no specific<br>priority assigned. |
|                    | Police | BURGLARY OF BUILDING -<br>FORCED ENTRY (PC 30.02<br>(C) (1)) (FS-22990001-E1)         | DORS | Home or building such as a shed broken into<br>without consent of owner, suspect is not at the<br>scene. DORS calls are responded to with no specific<br>priority assigned. |
|                    | Police | 13 - Prowler  | CAD  | Any unknown suspect lurking on or around private<br>property with permission or consent of the owner.<br>This call type is responded to as a code 2 priority<br>call.       |
| Shooting/Stabbing  | Police | 14 - Stabbing, Cutting  | CAD  | An Assault that has resulted in a penetrating physical injury. This call type is responded to as a code 1 priority call.  |
| Shooting/ Stabbing | Police | 19 - Shooting   | CAD  | A person suffered an injury as a result of a gun<br>shot. This call type is responded to as a code 1<br>priority call.  |
|                    | Police | 16 - Injured Person   | CAD  | A person has suffered some degree of accidental physical injury. This call type is responded to as a code 3 priority call.  |
| Aggravated Assault | Police | 16A - Injured Person<br>w/Amb   | CAD  | A person has suffered some degree of accidental physical injury and requires an ambulance. This call type is responded to as a code 2 priority call.                        |
| Sexual Assault     | Police | 41/25 - Criminal Aslt -In<br>Prog   | CAD  | An assault that is sexual in nature and identified to<br>be in progress. This call type is responded to as a<br>code 1 priority call.                                       |

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|          | Police | 25 - Criminal Assault   | CAD  | An assault that is sexual in nature. This call type is responded to as a code 2 priority call.   |
|----------|--------|---|------|--|
| Poli     | Police | 6X - Major Dist (Violence)  | CAD  | Disturbance were assaultive behavior (fight/<br>arguments/ etc.) have occurred. This call type is<br>responded to as a code 2 priority call.   |
|          | Police | 6XA - Major Dist<br>Ambulance   | CAD  | Disturbance were assaultive behavior (fight/<br>arguments/ etc.) have occurred and has resulted in<br>injury of person(s) requiring an ambulance. This call<br>type is responded to as a code 2 priority call.               |
|          | Police | 6XE - Disturbance<br>Emergency  | CAD  | Disturbance were assaultive behavior (fight/<br>arguments/ etc.) is currently in progress. This call<br>type is responded to as a code 1 priority call.  |
|          | Police | 6XEA - Disturbance Emerg<br>Amb   | CAD  | Disturbance were assaultive behavior (fight/<br>arguments/ etc.) is currently in progress and has<br>resulted in injury of person(s) requiring an<br>ambulance. This call type is responded to as a code<br>1 priority call. |
|          | Police | 31 - Criminal Mischief  | CAD  | Intentional damage of property under \$2,500. This call type is responded to as a code 4 priority call.  |
|          | Police | 31/01 - Crim<br>Mis/Prog/Non Felo   | CAD  | Intentional damage of property under \$2,500 and<br>suspect is at the scene. This call type is responded<br>to as a code 3 priority call.  |
| Mischief | Police | 41/31 - Crim<br>Mis/Progress/Felo   | CAD  | Intentional damage of property greater than \$2,500 and suspect is at the scene. This call type is responded to as a code 2 priority call.   |
|          | Police | CRIM MISCHIEF > OR<br>EQUAL \$2,500 < \$30K (PC<br>28.03(b)(4)(A)) (FS-<br>29990044-L101) | DORS | Intentional damage of property under \$30,000.<br>DORS calls are responded to with no specific<br>priority assigned.   |

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|                            | Police | CRIM MISCHIEF > OR<br>EQUAL \$100 < \$750 (PC<br>28.03(b)(2)) (MB-<br>29990042-L99)        | DORS      | Intentional damage of property under \$750. DORS calls are responded to with no specific priority assigned.   |
|----------------------------|--------|--|-----------|---|
|                            | Police | CRIM MISCHIEF <\$100 (PC<br>28.03(B)(1)) (MC-<br>99999999-L75)                             | DORS      | Intentional damage of property under \$100. DORS calls are responded to with no specific priority assigned.   |
|                            | Police | CRIM MISCHIEF >OR<br>EQUAL \$750 < \$2,500 (PC<br>28.03(b)(3)(A)) (MA-<br>29990043-L100)   | DORS      | Intentional damage of property under \$2,500.<br>DORS calls are responded to with no specific<br>priority assigned.   |
|                            | Police | CRIMINAL MISCHIEF > OR<br>EQUAL \$30K<\$150K (PC<br>28.03(B)(5)(A)) (F3-<br>29990065-L171) | DORS      | Intentional damage of property under \$150,000.<br>DORS calls are responded to with no specific<br>priority assigned.   |
|                            | Police | 26 - Missing Person  | CAD       | Adult that is missing and has not been seen by relatives or family. This call type is responded to as a code 3 priority call.   |
| Missing Person/ Abductions | Police | 26/01- Missing Person-<br>Critical   | CAD       | Child under the age of 10 or adult over the age of<br>70 or person who has medical conditions requiring<br>consistent attention that is missing and hasn't been<br>seen. This call type is responded to as a code 2<br>priority call. |
|                            | Police | PSE/26 - Missing Person  | Expeditor | Adult that is missing and has not been seen by relatives or family. This call type is responded to as a code 5 priority call.   |
|                            | Police | 17 - Kidnapping in<br>Progress   | CAD       | forcible abduction of a person of any age. This call type is responded to as a code 1 priority call.  |
|                            | Police | 17C - Child Abduction  | CAD       | forcible abduction of a child. This call type is responded to as a code 1 priority call.  |

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|                    | Police | 23 - Parking Violation         | CAD | Vehicle parked Illegally on public, City maintained<br>streets. This call type is responded to as a code 4<br>priority call.   |
|--------------------|--------|--------------------------------|-----|--|
| Parking & Roadways | Police | 37 - Street Blockage           | CAD | Vehicle or object blocking a roadway. This call type is responded to as a code 4 priority call.  |
|                    | Police | 37F - Freeway Blockage         | CAD | Vehicle or object blocking a highway. This call type is responded to as a code 2 priority call.  |
| Loud Noise         | Police | 6M - Loud Music<br>Disturbance | CAD | Excessive volume of music at any time and considered a nuisance. This call type is responded to as a code 4 priority call.   |
| Prostitution       | Police | 33 - Prostitution              | CAD | Solicitation of sexual services in exchange for some value. This call type is responded to as a code 3 priority call.  |
| Suicide            | Police | 34 - Suicide                   | CAD | A person has attempted, is attempting, or seriously<br>threatening to kill themselves. This call type is<br>responded to as a code 2 priority call.  |
| Gun Fire           | Police | 6G - Random Gun Fire           | CAD | Hearing (not witnessing) of gun discharge over<br>some distance. This call type is responded to as a<br>code 3 priority call.  |
| Aggravated Assault | Fire   | *A - Aggravated Assault        | CAD | A person has caused serious bodily injury to<br>another, and/or exhibits a deadly weapon during<br>the commission of the assault. This type of call is a<br>concern not only in regard to the condition of the<br>person suffering the assault, but also in regard to<br>scene safety for any responders. This call type is<br>responded to as a code 3 priority call. |
|                    | Fire   | AA - Aggravated Assault        | CAD | A person has caused serious bodily injury to<br>another, and/or exhibits a deadly weapon during<br>the commission of the assault. This type of call is a<br>concern not only in regard to the condition of the<br>person suffering the assault, but also in regard to  |

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|                  |      |                        |     | scene safety for any responders. This call type is responded to as a code 1 priority call.  |
|------------------|------|------------------------|-----|---|
| Criminal Assault | Fire | CA - Criminal Assault  | CAD | An assault that is sexual in nature. This call type is responded to as a code 3 priority call.                                      |
|                  | Fire | ALPHA - Injured Person | CAD | A person has suffered some degree of accidental physical injury. This call type is responded to as a code 1 priority call.          |
| Injurad Parson   | Fire | BRAVO - Injured Person | CAD | A person has suffered some degree of accidental physical injury. This call type is responded to as a code 1 priority call.          |
| Injured Person   | Fire | DELTA - Injured Person | CAD | A person has suffered some degree of accidental physical injury. This call type is responded to as a code 1 priority call.          |
|                  | Fire | IP - Injured Person    | CAD | A person has suffered some degree of accidental physical injury. This call type is responded to as a code 1 priority call.          |
|                  | Fire | GS - Gun Shot Wound    | CAD | A person has suffered physical injury as a result of a gun shot. This call type is responded to as a code 1 priority call.          |
| Gun Shot Wound   | Fire | *A - Gun Shot Wound    | CAD | A person has suffered physical injury as a result of a gun shot. This call type is responded to as a code 1 priority call.          |
|                  | Fire | DELTA - Gun Shot Wound | CAD | A person has suffered physical injury as a result of a gun shot. This call type is responded to as a code 1 priority call.          |
| Stabbing         | Fire | ST - Stabbing          | CAD | An aggravated assault that has resulted in a penetrating physical injury. This call type is responded to as a code 1 priority call. |

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| Mental Health | Fire | MH - Mental Health | CAD | An emergent situation in which a person is in need<br>of psyhcological assessment and treatment. The<br>person has demonstrated that they are a danger to<br>themself or others and exhibits at least one of the<br>following: acute onset of psychosis, severe thought<br>disorganization, or significant behavioral<br>deterioration rendering the person unmanageable<br>and unable to cooperate. This call type is<br>responded to as a code 3 priority call. |
|---------------|------|--------------------|-----|---|
| Suicide       | Fire | SU - Suicide       | CAD | A person has attempted, is attempting, or seriously<br>threatening to kill themselves. This call type is<br>responded to as a code 1 priority call.   |
| Overdose      | Fire | OD - Overdose      | CAD | A person has taken more than the recommended,<br>prescribed, or normal amount of a medication or<br>drug and may be suffering detrimental physical or<br>mental effects. This call type is responded to as a<br>code 1 priority call.   |
|               | Fire | BRAVO - Overdose   | CAD | A person has taken more than the recommended,<br>prescribed, or normal amount of a medication or<br>drug and may be suffering detrimental physical or<br>mental effects. This call type is responded to as a<br>code 1 priority call.   |
|               | Fire | CHARLIE - Overdose | CAD | A person has taken more than the recommended,<br>prescribed, or normal amount of a medication or<br>drug and may be suffering detrimental physical or<br>mental effects. This call type is responded to as a<br>code 1 priority call.   |
|               | Fire | DELTA - Overdose   | CAD | A person has taken more than the recommended,<br>prescribed, or normal amount of a medication or<br>drug and may be suffering detrimental physical or<br>mental effects. This call type is responded to as a<br>code 1 priority call.   |

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|   | Fire | OMEGA - Overdose                        | CAD | A person has taken more than the recommended,<br>prescribed, or normal amount of a medication or<br>drug and may be suffering detrimental physical or<br>mental effects. This call type is responded to as a<br>code 1 priority call.  |
|---|------|---|-----|--|
| Code Concern (Litter) - CCS             | 311  | Code Concern (Litter) -<br>CCS          | 311 | This Service Request type is used to report litter<br>found on private property and can be reported by<br>calling 311 or submitting online or through the<br>OurDallas App.  |
| Code Concern (Bulky Trash) -<br>CCS     | 311  | Code Concern (Bulky<br>Trash) - CCS     | 311 | This Service Request type is used to report<br>brush/bulky trash placed out at the wrong time or<br>in an incorrect manner. It can be reported by<br>calling 311 or submitting online or through the<br>OurDallas App.   |
| Code Concern (Noise<br>Complaint) - CCS | 311  | Code Concern (Noise<br>Complaint) - CCS | 311 | This Service Request type is used to report code<br>concerns related to noise complaints at businesses,<br>commercial properties, or noise created during<br>prohibited hours This type of service request<br>excludes concerns of loud music at residential<br>properties. This concern can be reported by calling<br>311 or submitting online or through the OurDallas<br>App. |
| Code Concern (Outside<br>Storage) - CCS | 311  | Code Concern (Outside<br>Storage) - CCS | 311 | This Service Request type is used to report items<br>being stored outside for over 24 hours on private<br>property and can be reported by calling 311 or<br>submitting online or through the OurDallas App.  |
| Code Concern (High Weeds)<br>- CCS      | 311  | Code Concern (High<br>Weeds) - CCS      | 311 | This Service Request type is used to report high<br>grass/weeds on private property and can be<br>reported by calling 311 or submitting online or<br>through the OurDallas App.  |

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| Code Concern (Parking on<br>Unapproved Surface) - CCS | 311 | Code Concern (Parking on<br>Unapproved Surface) -<br>CCS | 311 | This Service Request type is used to report vehicles<br>parking on unapproved surfaces (such as grass and<br>dirt) on private property and can be reported by<br>calling 311 or submitting online or through the<br>OurDallas App.  |
|---|-----|--|-----|---|
| Code Concern (Dangerous<br>Condition) - CCS           | 311 | Code Concern (Dangerous<br>Condition) - CCS              | 311 | This Service Request type is used to report any type<br>of hazardous condition (such as exposed electrical<br>lines, inoperable pool fences, or hazardous holes)<br>on private property and can be reported by calling<br>311 or submitting online or through the OurDallas<br>App.         |
| Code Concern (Illegal Land<br>Use) - CCS              | 311 | Code Concern (Illegal<br>Land Use) - CCS                 | 311 | This Service Request type is used to report use of<br>land that is against the zoning regulations or being<br>used without a required certificate of occupancy on<br>private property. This concern can be reported by<br>calling 311 or submitting online or through the<br>OurDallas App. |
| Code Concern (Illegal<br>Garbage Placement) - CCS     | 311 | Code Concern (Illegal<br>Garbage Placement) - CCS        | 311 | This Service Request type is used to report<br>improper placement of garbage roll carts on private<br>property and can be reported by calling 311 or<br>submitting online or through the OurDallas App.   |
| Parking - Report a Violation -<br>TRN                 | 311 | Parking - Report a<br>Violation - TRN                    | 311 | This service request type is used to report parking violations on a public street, sidewalk or alley. This request can be called in to the 311 Service Center, entered online or using the mobile app.  |
| Chronic Noise Complaint -<br>DPD                      | 311 | Chronic Noise Complaint -<br>DPD                         | 311 | This service request type is used to report noise<br>complaints of a chronic or reoccurring nature. This<br>request can be called in to the 311 Service Center,<br>entered online or using the mobile app.  |

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| Miscellaneous Service<br>Request - 311 | 311 | Miscellaneous Service<br>Request - 311 | 311 | This service request type is used to report general<br>concerns not available on the current list of service<br>request types. This request is reviewed and then<br>forwarded to the correct department to respond.<br>This request can be entered online or using the<br>mobile app.   |
|--|-----|--|-----|---|
| Extra Police Patrol - DPD              | 311 | Extra Police Patrol - DPD              | 311 | This service request is used when a resident would<br>like to request additional police patrol in their<br>neighborhood or a specific Dallas area. This request<br>can be called in to the 311 Service Center, entered<br>online or using the mobile app.   |
| Narcotics/Vice Complaint -<br>DPD      | 311 | Narcotics/Vice Complaint<br>- DPD      | 311 | This service request is used to report possible drug<br>houses/locations where drugs are being sold,<br>prostitution and illegal gambling complaints. This<br>request can be called in to the 311 Service Center,<br>entered online or using the mobile app.  |
| Criminal Activities - DPD              | 311 | Criminal Activities - DPD              | 311 | This service request is used to report complaints of<br>reoccurring criminal offenses such as burglaries,<br>thefts, criminal mischiefs in a particular<br>neighborhood that have been reported. This<br>request can be called in to the 311 Service Center,<br>entered online or using the mobile app.                                     |
| Street/Road Blockage - TRN             | 311 | Street/Road Blockage -<br>TRN          | 311 | This service request is used to report non-<br>emergency concerns regarding vehicles that are<br>blocking the street that may be<br>abandoned/unoccupied or disabled in the need of<br>traffic control until the vehicle is in a safe location<br>or not blocking the roadway. This request must be<br>called in to the 311 Service Center. |
| Handicap Parking Violation -<br>DPD    | 311 | Handicap Parking<br>Violation - DPD    | 311 | This service request is used to report handicap parking violations at a business. This request can be   |

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|  |     |  |     | called in to the 311 Service Center, entered online or using the mobile app.   |
|--|-----|--|-----|--|
| Parking in Fire Lane/ Fire<br>Hydrants - DFR | 311 | Parking in Fire Lane/ Fire<br>Hydrants - DFR | 311 | This service request is used to report vehicles that<br>are parked in marked fire lanes, or vehicles parked<br>on the street within 15 feet of a fire hydrant. This<br>request can be called in to the 311 Service Center,<br>entered online or using the mobile app.                                      |
| Short Term/Vacation Rental<br>Survey - CCS   | 311 | Short Term/Vacation<br>Rental Survey - CCS   | 311 | This Service Request is used to track and survey<br>customers about possible issues regarding short<br>term rental/vacation properties. Information<br>provided is used for tracking purposes only. This<br>request can be called in to the 311 Service Center,<br>entered online or using the mobile app. |