

Issue	Subcommittee Policy Recommendation	Comments
STR Legality	Allow STRs in Culver City	Approximately 300 STRS are currently operating in CC. Ban would be difficult and expensive to enforce without any revenue to offset. Core group of resident stakeholders (nearly all hosts) interested in permitting. Some residents, however, are opposed.
Permit Requirement	Require a Permit	1) Raise fees to cover costs associated with enforcement; 2) Provide City something to revoke if rules are not followed; and 3) Provide City information about where STRs are located and how to contact them if necessary, particularly in response to public complaints.
Residency Requirement	Primary Residence Only	Minimizes loss of housing stock to investment properties used exclusively as STRs. Limits the number of STRs overall since each person can only have one. Potentially better host oversight of guests in host's own home. Decision point for City Council: how to define residency. Options: IRS definition of residency, or residence 6 months of the year, or 9 months of the year. Possibility of fraud (investors use relatives to claim personal residence, etc.) Time intensive for enforcement.
Contact Requirement	Require a local, 24/7 contact who must respond to complaints and concerns from the City within 1 hour.	In most cases, this will be the host. If host goes out of town, they could list a secondary contact. This would ensure hosts can respond to complaints.

<p>Hosted vs Unhosted</p>	<p>No requirement</p>	<p>Limiting STRs to primary residences and requiring a 24/7 contact addresses many of the problems that “unhosted” rentals might have. Primary residence requirement ensures that host will be onsite much of the time. If the host is offsite and there is a problem, the 24/7 contact will either resolve it, or if they are not able to resolve it, after a certain number of incidents the City may revoke the permit. It is difficult to enforce if only limiting to hosted. For example, some cities have their code enforcement officers stay the night at an STR in order to establish a violation that the STR is in fact unhosted.</p>
<p>Accessory Dwelling Units</p>	<p>Council should consider various options.</p> <p>Option A: Allow STRs in ADUs permitted between 2005 and 2017 (prior to the explicit prohibition of short term rental of ADUs) but prohibit ADUs as STRs moving forward.</p> <p>Option B: Allow STRs in ADUs permitted between 2005 and 2017, and allow STRs ADUs moving forward.</p>	<p>The ADU ordinance currently prohibits renting ADUs for less than 30 days. If STR regulations allow ADUs to be used, ADU ordinance would need to be revised to match STR regulations. Reasons to continue prohibition: ADUs can be an important source of much needed long-term and/or low-income housing. Reasons to permit STRs in ADUs: Many Culver City residents are currently using ADUs as STRs (or living in the ADU and using the main residence as an STR) and would like to continue. ADUs can provide homeowners with additional rental income.</p> <p>Option A: Allows many (but not all) residents who have been using ADUs as STRs to continue while preventing additional decay in long term housing stock. However, there are significant challenges to tracking and enforcement going forward since the policy will be different depending on the address. Would require modification of any/all Administrative Use Permits issued 2005 – 2017 to be modified.</p> <p>Option B: Most liberal allowance. STRs would be allowed in all legal ADUs permitted after 2005. Develop amnesty program to legalize any ADUs converted prior to 2005 without permits. Would require all Administrative Use Permits issued 2005 – 2017 to be modified, and covenants recorded from 2017 – present to be modified. City could consider pairing with incentive program for ADUs which would streamline permitting in return for commitment to be used as long term or low-income housing for first 5-10 years.</p>

	Option C: Prohibit ADUs from being used for STRs.	Option C: Prevents reduction in the long term housing stock. ADUs can be an important solution to providing additional housing. State law changes in 2017 intended to use ADUs for more long term housing.
Apartment, Duplex or Triplex.	If owner’s primary residence is off-site: not permitted. If owner’s primary residence is on-site: only in owner’s primary residence unit.	Even if a host lives in one of the units, the other units can be used for long term housing. The alternative, allowing owner of duplex or triplex who lives in one unit to use one or more of the other units as an STR, takes long term housing off market and avoids the primary residence requirement.
Homeowner vs Renter	Renters can host with landlord approval.	STRs can be added source of income. Landlord’s approval should be required because they are a key stakeholder and the use of the property affects them.
Neighbor Notification	Not required.	Recommend hosts inform their neighbors as a best practice for STR hosts in City materials.
Inspection	Not required. Require self certification of certain safety standards during application process (evacuation map posted in room, fire extinguisher on site, etc.)	Requiring an inspection may reduce registration compliance because it is burdensome and will increase permit fee costs. Inspections could be done on a complaint driven basis.
Hosting Platform Requirements	(1) Requirement to have data field for CC STR permit number on all listings. (2) Requirement for all hosting platforms advertising listings in Culver City to collect and remit taxes to City on behalf of hosts, including basic information (such as already required through Airbnb VCA agreement).	(1) AirBnB provides this feature. Could assist with tracking and enforcing Code. (2) Increases TOT collection rates. Enforcement may be difficult.

Advertising Requirements	(1) CC STR Permit number must be listed in all advertisements. (2) Advertisements must not list properties not in compliance with City ordinance (e.g. listing says “commercial events are allowed”)	Provides another, simpler method of enforcement. The advertisement itself establishes the violation rather than expending the resources involved in proving a host has actually rented the STR to a guest, which can be challenging.
Penalty Structure	Escalating, 3 part penalty structure: (1) written warning from City, (2) monetary penalty (fine), (2) permit revocation.	Subject to review with requirements of CCMC. Higher penalty amounts are recommended.
Commercial Events	No commercial events allowed.	Prevent noise, traffic, trash, and other nuisance activities.
Maximum number of people per bedroom	No cap.	Not being recommended by Fire Department for safety reasons. Difficult to enforce. This is also regulated by the Public Health Code.
Required Life Safety Standards	Smoke alarms inside and outside each sleeping area; on each story of building; CO detector within every room that has a fossil fuel burning appliance and in any attached garage; recommend fire extinguisher in kitchen and near every cooking source/open flame	Fire Department recommends these standards.
Permitting System/Procedures	To be developed as administrative guidelines.	The most important and unlikely to change requirements can be put into the ordinance. For others, placing them in Administrative Guidelines referred to in the ordinance may allow greater flexibility moving forward as the City accumulates lessons learned over time, rather than requiring further amendments to the CCMC.
Other Operating Standards	To be developed as administrative guidelines.	