



SafeWays

STR Compliance & Public Safety Support

City of Memphis | SafeWays | February 2026



SafeWays

Opening Statement

Good afternoon, Chairman and Councilmembers.

Thank you for your time today and thank you to Councilman Spinoso for his collaboration and engagement as we've worked through this proposal.

SafeWays was founded in 2015 to address crime through prevention, not enforcement.

We do not replace law enforcement, and we do not duplicate existing city functions.

Independent evaluation by the University of Memphis Public Safety Institute has identified measurable reductions in crime associated with the SafeWays model.



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About SafeWays

SafeWays is a 501(c)(3) nonprofit organization founded in 2018 to reduce crime through structured, evidence-based environmental strategies.

Our model focuses on identifying and addressing environmental risk factors before they escalate into recurring public safety burdens.

Independent evaluation by the University of Memphis Public Safety Institute has identified measurable reductions in crime associated with the SafeWays model.



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How SafeWays Works

- GIS-based crime analysis and spatial mapping
 - Crime Prevention Through Environmental Design (CPTED)
 - Calls-for-service and nuisance trend monitoring
 - Coordinated collaboration with law enforcement
 - Our approach complements and strengthens existing public safety structures through prevention, accountability, and measurable outcomes.



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Framing Today's Proposal

- Today's proposal is designed to support prevention, accountability, and coordination.
 - It is not intended to create additional administrative burden.
 - The goal is to reduce long-term strain on public safety systems through structured oversight and measurable reporting.
 - We appreciate the opportunity to discuss it with you.



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SafeWays Call Data Monitoring

- 30 / 90 / 180-Day Police Call Tracking
- Categorized by violent, nuisance, property crime
- Arrest category reporting
- Escalation flagging for repeat activity
- District-level trend reporting



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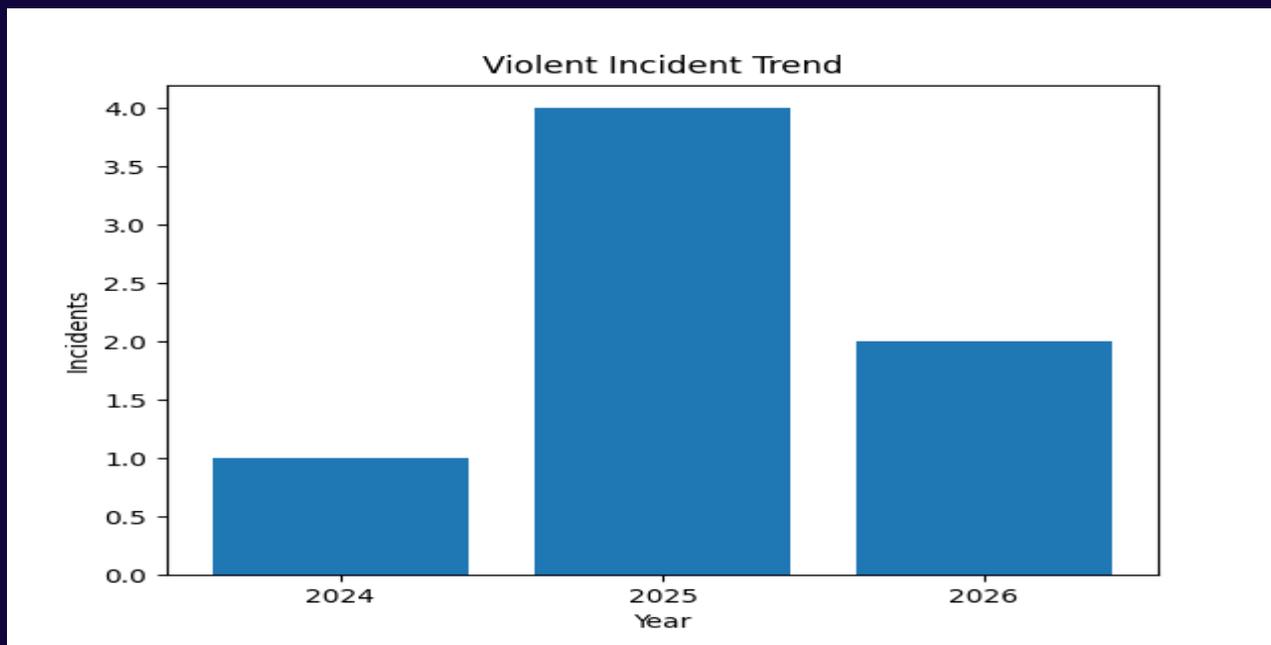
Memphis STR Market Context

- Estimated 1,425 – 2,956 active listings (Airbnb sources)
- 76% year-over-year growth (2024)
- Average Daily Rate: \$115–\$151
- Highest concentrations: Downtown & Midtown

- Supplemental Verification Method
- Public online search of property address to identify advertised short-term rental activity

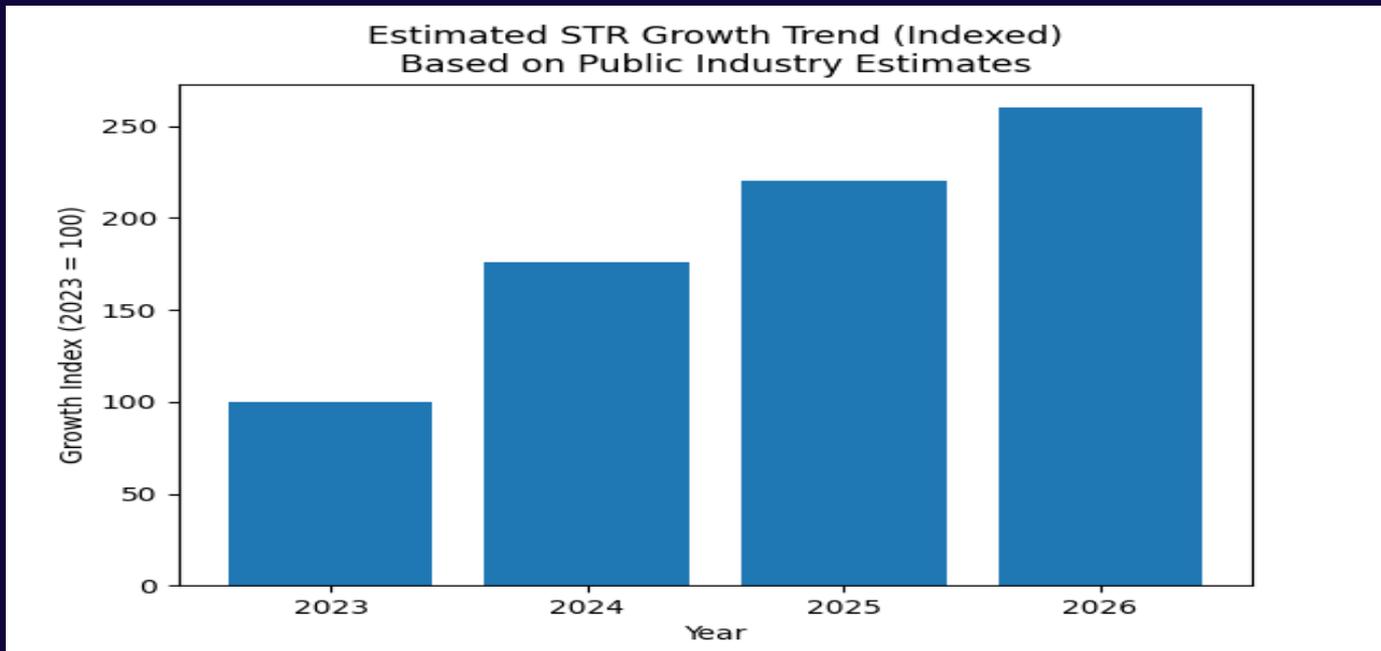
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Memphis STR Market Context (2024–2026)



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Memphis STR Market Growth (2023–2026)





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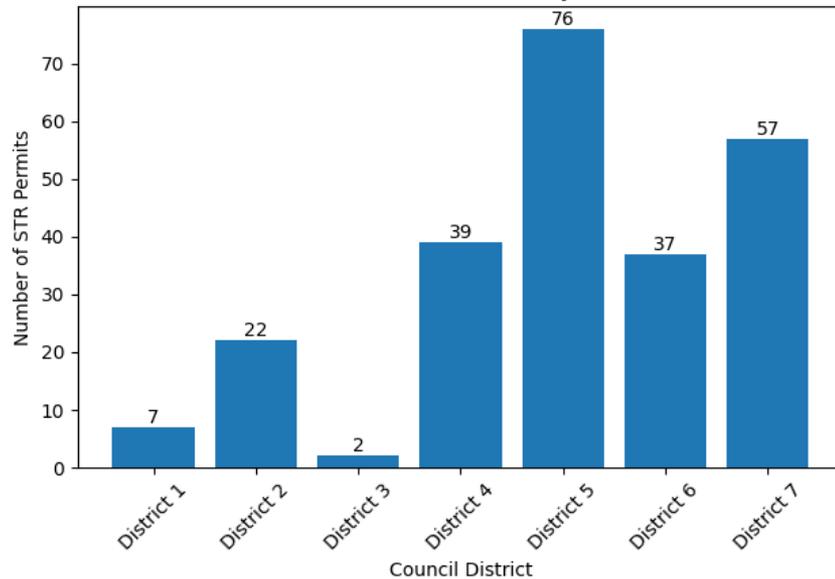
Memphis STR Market Scale

- Estimated 1,300 – 3,000 listings
 - 76% year-over-year growth
 - Concentration in Midtown & Downtown
 - Oversight has not scaled at same rate

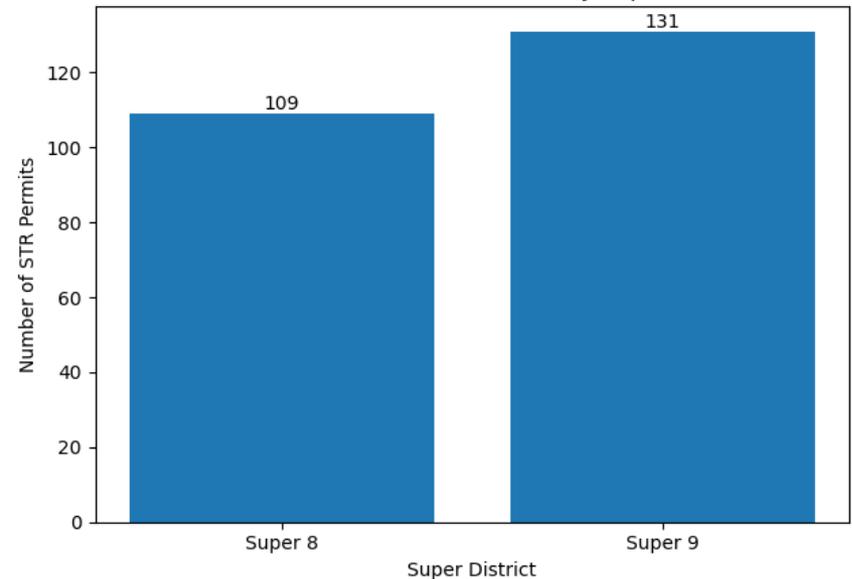
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STR Distribution Comparison: Council vs Super Districts

Active Short-Term Rental Permits by Council District



Active Short-Term Rental Permits by Super District





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Problem Statement – Rapid STR Growth vs Oversight Capacity

- STR market growth has outpaced municipal scaling
 - Digital detection exists but lacks physical validation
 - Public safety trends require structured documentation
 - Neighborhood stabilization requires data-driven model

The image shows the SafeWays logo, which consists of the word "SafeWays" in a dark blue, sans-serif font. The letters "Way" are partially overlaid by a yellow and blue graphic element that resembles a stylized flag or a curved banner. The background of the top half of the slide is a blue-tinted silhouette of a city skyline with various skyscrapers and a bridge, set against a light sky.

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Why Certain STR Properties May Attract Misuse

- Anonymous or remote booking systems
 - Lack of on-site management presence
 - High guest turnover in dense tourism areas
 - Limited neighbor familiarity with rotating occupants
 - Digital-only oversight without physical verification

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311 Code Issue Tracking & Verification Workflow

- Blight or exterior code issue identified during review or site visit
 - 311 service request submitted through official City reporting system
 - 311 ticket number documented in SafeWays tracking system
 - Ticket monitored until City marks issue as closed or resolved
 - Post-closure site verification conducted when appropriate
 - Time-stamped documentation confirms compliance correction
 - Structured advisory update provided to City department
 - This process ensures transparency, accountability, and documented follow-through

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City AI Monitoring System – What It Does Well

- Granicus / Host Compliance platform monitors 70+ listing platforms 24/7
- AI photo and metadata matching identifies potential STR listings
- Cross-referenced against Develop901 permit records
- Automated compliance notifications generated when discrepancies appear
- Provides strong digital detection capability



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Where Digital Monitoring Has Operational Gaps

- Cannot verify physical permit posting inside units
 - Cannot confirm 5% apartment cap compliance on-site
 - Cannot assess lighting, surveillance, or environmental risks
 - Cannot confirm secured or unmanaged access points
 - Cannot evaluate night-time activity patterns
 - Digital systems detect — but do not physically validate

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AI + Field Integration Model – How SafeWays Fills the Gaps

- AI flags potential issue or discrepancy
- SafeWays conducts structured permit & data review
- Field visit performed when needed (time-stamped documentation)
- 5% apartment threshold verification conducted when applicable
- CPTED-based exterior safety assessment completed
- Structured advisory report returned to City department
- AI detection + physical verification = complete oversight model

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AI + Field Coordination Workflow

- AI identifies potential listing or permit discrepancy
 - SafeWays conducts structured verification review
 - If needed, field visit conducted with timestamp photos
 - Structured report returned to City department

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Field Verification Protocol – Detailed

- Time-stamped photographic documentation
 - Permit posting verification (interior where visible)
 - Exterior CPTED lighting and access assessment
 - Apartment unit count verification for 5% threshold



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STR Identification – Digital & Platform Monitoring

- Search Engine & Platform Review:
 - Public Google/Bing address searches
 - Airbnb / VRBO / Booking.com listing scans
 - Listing photo comparison & metadata review
 - Historical listing verification (pre-2023 grandfather review)
- AI & Third-Party Monitoring Tools:
 - Host Compliance / Granicus cross-referencing
 - Permit database comparison (Develop901 exports)
 - Duplicate listing detection
 - Active listing vs permit mismatch flagging



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STR Identification – Community & Public Reporting

- Citizen & Neighborhood Complaints:
 - 311 service requests
 - Direct neighborhood reports
 - Council office referrals
 - HOA / apartment management reports
- Public Safety Data Integration:
 - 30 / 90 / 180-day police call patterns
 - Arrest category trend review (No Personally Identifiable Information)
 - Repeat party-location identification
 - Cross-check with active permit status



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STR Identification – Media, Field & Open-Source Review

- News & Media Monitoring:
 - Local news Media
 - Social media event promotions
 - Party advertising on Instagram / Facebook
 - Rap video or event rental postings
- Field Verification Methods:
 - Time-stamped exterior site visits
 - Permit posting verification (where visible)
 - Apartment 5% threshold validation
 - CPTED lighting & access assessment
- All findings derived from publicly accessible sources only



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Integrated STR Detection & Verification Workflow

- Step 1: Digital Listing or Complaint Identified
 - Step 2: Cross-Reference with Permit Database (Sec. 5-44)
 - Step 3: Police Call & 311 Pattern Review
 - Step 4: Field Verification (if warranted)
 - Step 5: Internal Risk Classification
 - Step 6: Advisory Report Submitted to City Department
-
- AI Detection + Community Reporting + Field Validation = Complete Oversight Model

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Apartment-Based STR Monitoring & 5% Threshold Verification

- Memphis ordinance limits STR concentration within multi-family properties (5% cap where applicable)
 - Verification ensures apartment communities are not exceeding allowable STR percentage
 - Cross-referencing permit records with total unit count per property
 - Prevents large-scale 'ghost hotel' operations within residential complexes
 - Supports long-term residents while allowing compliant STR activity

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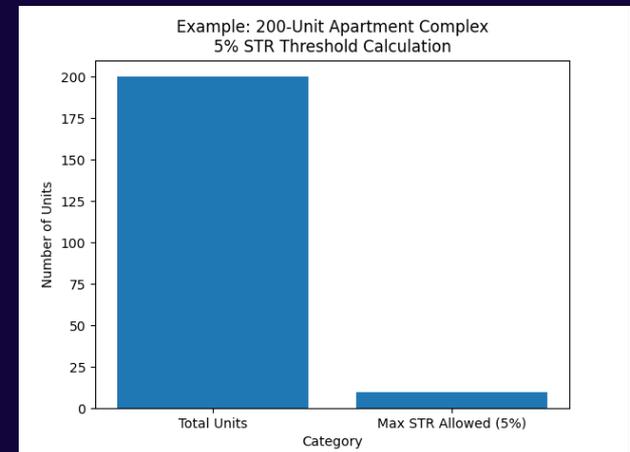
How 5% Threshold Can Be Verified

- Identify total unit count of apartment complex
- Count permitted STR units within the property
- Calculate STR percentage of total units
- Flag if threshold exceeds ordinance limit
- Report findings to appropriate City department (advisory only)

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How the 5% Cap Works in Practice

- Example: 200-unit apartment complex
 - 5% of 200 units = 10 STR units maximum
 - If 11+ units operate as STR → exceeds ordinance cap
 - Verification protects long-term residents and compliant operators
 - Findings reported in advisory capacity only





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Memphis STR Ordinance – Chapter 5-44 Overview

- Short-Term Rental (STR) Permit Required Prior to Operation
- Permit required before operation (Sec. 5-44(3)(a))
- \$300 application / \$150 renewal (Sec. 5-44(4))
- Permit valid 365 days (Sec. 5-44(3)(f))
- Proof of insurance required (Sec. 5-44(3)(c))
- Responsible party within 50 miles (Sec. 5-44(3)(d))
- Permit must be visibly posted (Sec. 5-44(3)(g))

- Operation without permit = violation of Sec. 5-44



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Common Noncompliance Conditions Under Sec. 5-44

- Noncompliance Conditions Under Sec. 5-44:
- Operating without valid permit (5-44(3)(a))
- Expired permit / failure to renew (5-44(3)(f))
- Exceeding 5% multi-family cap (5-44(2)(h))
- Failure to maintain responsible local contact (5-44(3)(d))
- Failure to maintain insurance (5-44(3)(c))
- Failure to display permit (5-44(3)(g))
- Repeated nuisance violations (5-44(6))



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Multi-Family STR Cap – 5% Threshold Enforcement

- Multi-Family STR Cap (Sec. 5-44(2)(h)):
- Maximum 5% of total dwelling units may operate as STRs
- Verification Requires:
 - Total unit count confirmation
 - Permitted STR count verification
 - Percentage calculation & reporting
- Exceeding threshold = ordinance violation



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Anti-Trespass Partnership – Shelby County DA Office

- Shelby County District Attorney Anti-Trespass Program:
 - Property owners voluntarily authorize law enforcement to enforce trespass laws
 - Allows MPD to remove unauthorized individuals without owner present
 - Supports rapid response to party spillover, loitering, and repeat nuisance activity
- Application to Short-Term Rentals (STRs):
 - Helps deter unauthorized gatherings at vacant or rotating-occupancy properties
 - Supports apartment-based STR oversight participation
 - Provides proactive public safety tool without revoking permit
 - Complements Sec. 5-44 compliance monitoring and 311 documentation
- SafeWays Role: Advisory coordination and documentation support only



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SafeWays Scope of Work

- Permit verification
- Police call monitoring (30/90/180 days)
- Arrest category reporting (Personally Identifiable Information)
- 311 documentation
- 3+ calls within 90 days
- Violent crime call or arrest
- Operation without permit
- Multiple unresolved 311 issues
- Elevated CPTED rating



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Why District-Level Reporting Matters

- Provides transparency for Council Members
- Supports neighborhood-level awareness
- Identifies localized compliance patterns
- Assists targeted stabilization



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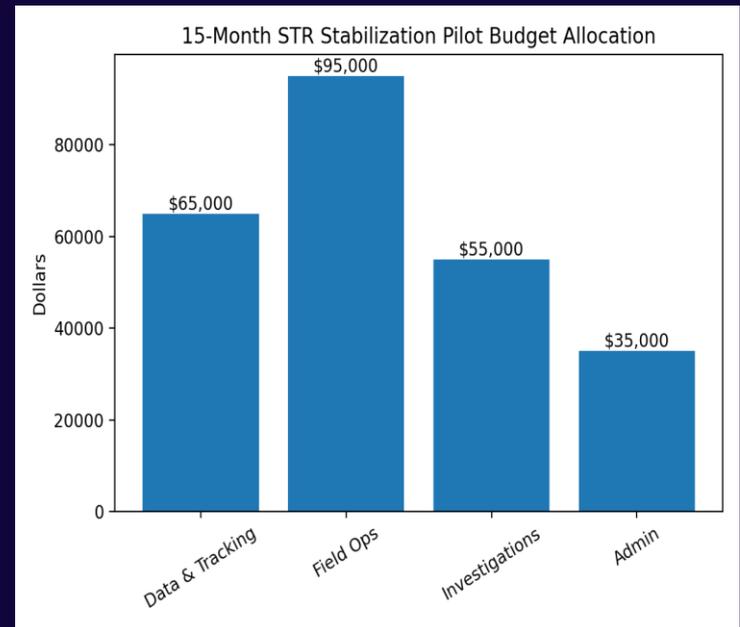
District-Level Transparency Model

- District-specific STR address totals (upon GIS mapping)
- Monthly district summary reporting to Council Members
- Trend monitoring by district over time
- Improves localized visibility and accountability

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15-Month STR Stabilization Pilot

- Funding Request: \$250,000
- AI + Field verification integration
- Monthly reporting to Council Members
- Supports responsible STR operators





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Oversight Modernization Vision

- AI + Field integration model
- Improved cross-department coordination
- Structured reporting to Council Members
- Balanced tourism and neighborhood protection



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Expanded Escalation Model

- Tier 1: Monitoring (0–2 calls within 90 days)
- Tier 2: Advisory Review (3+ calls or 1 violent incident)
- Tier 3: Formal Administrative Package Prepared
- Tier 4: HB 1050 Threshold Review (if applicable)



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Council Reporting Structure – Expanded

- Monthly STR compliance summary
 - Quarterly district trend comparison
 - HB 1050 qualifying property monitoring report
 - Pilot performance metrics dashboard

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15-Month Pilot – Expanded Deliverables

- AI + field integrated verification model
 - Monthly district transparency reporting
 - Apartment STR 5% compliance verification support
 - Structured nuisance threshold monitoring (HB 1050)
 - Quarterly Council briefing deck

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Long-Term Vision – STR Stabilization Model

- Balance tourism & neighborhood stability
 - Predictive risk monitoring framework
 - Transparent district-level visibility
 - Scalable oversight model for future growth



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Purpose of This Presentation

- Present structured STR findings
 - Support responsible STR operators
 - Enhance compliance transparency
 - Strengthen public safety visibility
 - Assist Memphis AI monitoring



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STR Permit Requirements (Chapter 5-44)

- Permit required before operation
- \$300 application / \$150 renewal
- 365-day expiration
- Insurance verification required
- Responsible party within 50 miles

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Balanced Approach: Supporting Legitimate STR Operators

- This initiative is NOT intended to target or harm short-term rental businesses
 - The goal is to protect and support compliant, responsible STR operators
 - Promotes fair competition by addressing bad actors
 - Encourages transparency and consistent application of existing ordinance
 - Balances tourism growth with neighborhood stability and public safety



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Public Data Sources & Neutral Role

- STR permit data obtained through Develop901 public dashboard
 - Application & renewal exports from publicly accessible City systems
 - Calls-for-service data from Real Time Crime Center
 - Arrest data from Shelby County public portal
 - SafeWays provides structured data only
 - SafeWays does NOT enforce laws or issue penalties



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Advisory & Non-Enforcement Role

- SafeWays does not issue citations
- SafeWays does not impose penalties
- SafeWays does not conduct criminal investigations
- Findings provided for administrative awareness only



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Verified STR Dataset Summary

- 198 Unique STR-Related Addresses Identified
 - Appear in Active Permit Dataset
 - 11 Renewal Records Identified
 - Address-level de-duplication performed
 - All data derived from public municipal systems



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Vacation Properties & STR Classification

- Marketing labels vary (vacation home, executive stay)
 - If transient occupancy occurs, STR ordinance applies
 - Classification based on use, not branding
 - Ensures consistent compliance under Sec. 5-44