



CITY OF CORPUS CHRISTI DEVELOPMENT SERVICES

TO: Development Services Customers

SUBJECT: **INFORMATION BULLETIN (IB) 022**
Application of Municipal Code Article II – Short-Term Rentals

DATE: July 31, 2026

CREATED BY: Development Services Department (DSD)

Purpose:

This Interpretation Bulletin provides clarification and staff guidance for administering Municipal Code Article II – Short-Term Rentals. It explains the proper reading, interpretation, application, and overall administration of this section of the Code, with particular focus on the eligibility criteria for Type II Short-Term Rentals (STRs). The Bulletin serves as interim guidance reflecting current practice and legislative intent, pending any future review or amendment of the STR ordinance.

Code and Policy References:

- Municipal Code Article II – Short-Term Rentals
 - Municipal Code Article II, Section 5-37 – Definitions
 - Municipal Code Article II, Section 5-39 – Short-term rental permit
 - Municipal Code Article II, Section 5-43 – Density limitations for type 2 short-term rentals (non-owner occupied) in residential areas

Municipal Code Excerpts (Definitions):

- *Block face* means the properties abutting one (1) side of a street and lying between the two (2) nearest intersecting or intercepting streets, or nearest intersecting or intercepting street and/or railroad right-of-way, unsubdivided land, watercourse, or city boundary.
- *Type 1 short-term rental (owner-occupied)* means a residential dwelling unit, a portion thereof, which is either occupied by the owner, as reflected in title records, or an operator as reflected in a valid lease agreement, and with the express permission of the property owner. Accessory dwelling units will be considered occupied by the owner where the primary residential dwelling is occupied by the owner, as reflected in title records, or an operator as reflected in a valid lease agreement, and with the express permission of the property owner. The owner or operator shall make his or her legal residence on the same property, as evidenced by homestead exemption, voter registration, vehicle registration, or similar means.
- *Type 2 short-term rental (non-owner occupied)* means a residential dwelling unit, or a portion thereof, which is either not occupied by the owner or operator, or the owner or operator does not occupy another dwelling unit, or portion thereof, on the same property, as reflected in title records.

Review of STR Permit Applications:

Type I Short-Term Rentals (owner-occupied) are verified through documentation confirming that the owner or lawful occupant resides on the STR property, either within the primary dwelling or an accessory dwelling unit (ADU). Staff reviews title records, lease agreements, owner-authorization letters, voter registration, vehicle registration, and driver's licenses to confirm occupancy, and an ADU is considered owner-occupied when the primary dwelling is occupied by the owner or an operator with a valid lease and the owner's express permission. Residency must be demonstrated through a homestead exemption, voter registration, vehicle registration, or similar documentation showing that the STR site is the individual's legal residence. Based on this definition, Type I STRs are not subject to any block-face calculation, as their eligibility is determined solely by verified owner or operator occupancy.

Type II Short-Term Rental (STR) permits are allowed in residential zoning districts but are limited to 15 percent of the total residential units on a block face. During the June 28, 2022, City Council meeting, Council questioned scenarios in which the block-face calculation resulted in a fractional number that would otherwise prevent an STR from being eligible. Staff explained that the appropriate approach was to round the calculation up to the next whole number. Council agreed with this interpretation, and while the rounding language was not added to the ordinance text, the legislative intent behind Council's approval clearly endorsed rounding up when determining Type II eligibility. Accordingly, the 15-percent cap is applied using a block-face calculation rounded to the nearest whole number, consistent with Council direction and the accompanying PowerPoint presentation.

Block face is based on the address of the property requesting the STR permit. As defined, the block face consists of the properties abutting one side of a street between the two nearest intersecting or intercepting streets—or between an intersecting street and a physical boundary such as a railroad right-of-way, unsubdivided land, watercourse, or the city limit.

As mentioned above, Type II STRs, are regulated by a density limit of 15 percent of the residential units on the applicable block face, calculated according to the address of the STR request. In situations where a potential Type II STR is located on an intersecting corner, the block face used for the density calculation will be the block face corresponding to the street on which the property is addressed.

Example Scenarios:

Type II STR to be located at 2424 Hackberry Drive:

- Total residential units on block face: 4
- $15\% \text{ of } 4 = 0.6$
- Per Council direction and legislative intent dated June 28, 2022, the number is rounded up to 1
- Result: only one Type 2 STR is permissible on this block face.

Type II STR to be located at 4848 Hackberry Drive:

- Total residential units on block face: 8
- $15\% \text{ of } 8 = 1.2$
- Per Council direction and legislative intent dated June 28, 2022, the number is rounded up to 2
- Rounded up = 2 allowable Type 2 STRs
- Result: Two Type 2 STRs are permissible on this block face.

Conclusion:

This IB consolidates the relevant code provisions, definitions, review procedures, and legislative intent necessary for consistent administration of Municipal Code Article II – Short-Term Rentals. It affirms the distinction between Type I and Type II STRs, clarifies the documentation required to verify owner or operator occupancy for Type I permits, and outlines the density limitations applicable to Type II permits, including the City Council-endorsed practice of rounding block-face calculations up to the nearest whole number.

It further establishes that block-face determinations are based on the address of the STR request, including corner-lot scenarios. Together, these clarifications provide guidance to ensure uniform and consistent application of the STR ordinance until such time that the City Council elects to review or amend the underlying regulations.

Link to Municipal Code Article II:

https://library.municode.com/tx/corpus_christi/codes/code_of_ordinances?nodeId=PTIITHCOOR_CH5BURE_ARTIISHRMRE

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