

MEMORANDUM

TO: Metropolitan Traffic and Parking Commission

FROM: Jason Oldham, Assistant Chief of Engineering,
Nashville Department of Transportation

DATE: February 5, 2024

SUBJECT: February 12, 2024, Traffic and Parking Commission Agenda Analysis

PURPOSE:

Provide an overview of all items on the upcoming Metropolitan Traffic and Parking Commission agenda to ensure that commission members have the information necessary for discussion and action prior to the commission meeting.

Commissioners are encouraged to contact Nashville Department of Transportation (NDOT) staff prior to the meeting with any questions.

STAFF ANALYSIS:

Consent Agenda

5.1 CD 19: Mandatory Referral 2023M-014AB-001, a request to abandon a portion of the right-of-way and public utility easements on Russell St between Interstate Drive and S 1st St and on S2nd St between Woodland St and Victory Ave, requested by Ragan Smith Associates.

Analysis: This mandatory referral is a request for the abandonment of a portion of Russell Street between 1st Ave. and S. 2nd Ave. for right-of-way only. The easements are to be retained through this portion of Russell. This request is made in support of Image East Nashville and is for the construction of a new football stadium. Groundbreaking for this construction project has been announced to be February 29, 2024.

Recommendation: Approval of Mandatory Referral 2023M-014AB-001.

Consent item 5.1—ROW abandonment for football stadium

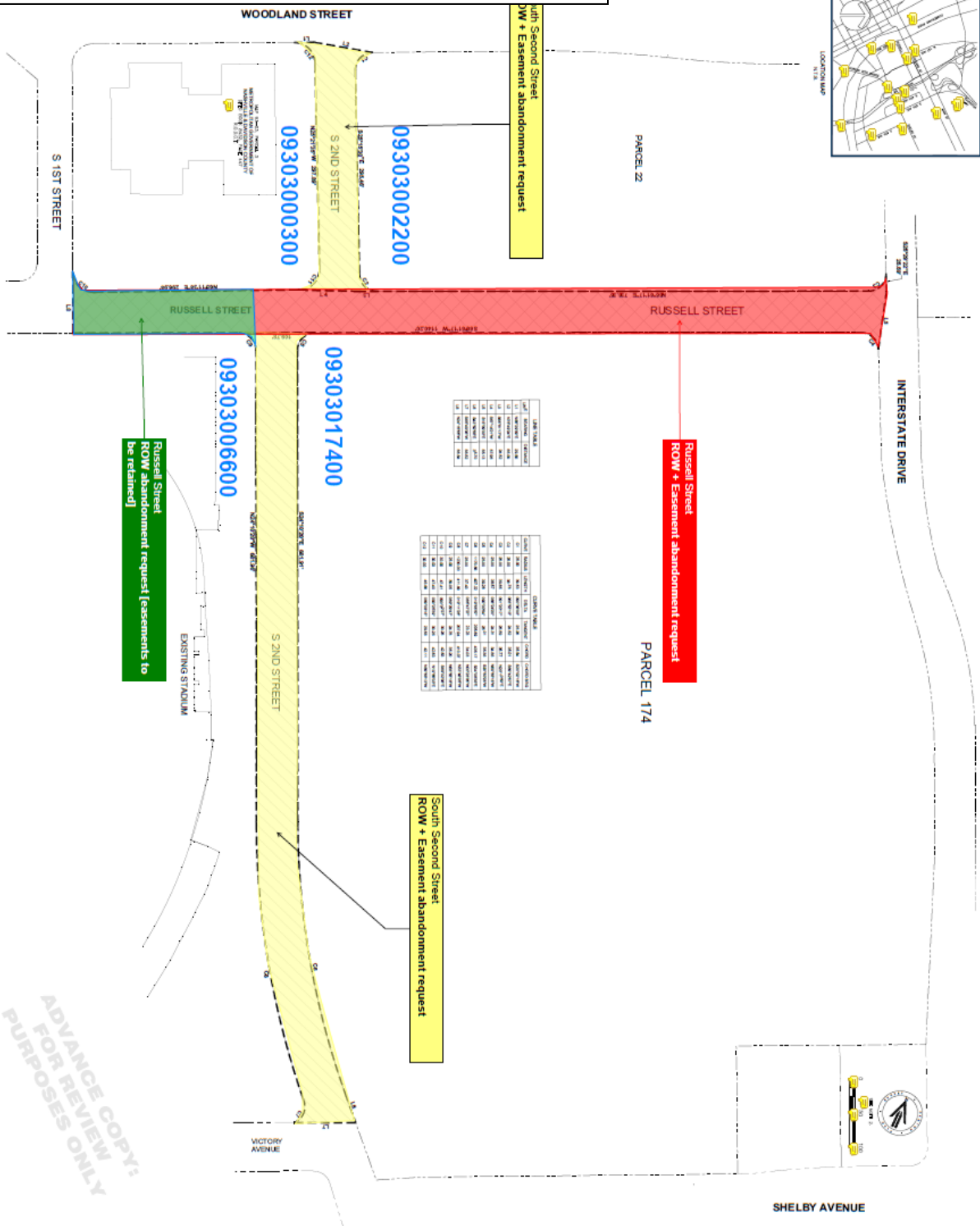
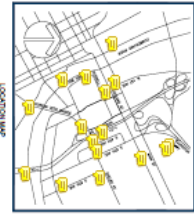


TABLE 1
EXISTING UTILITIES

UTIL. TYPE	DEPTH (FEET)	LOCATION (EASTING, NORTHING)
1	12"	1000.00, 1000.00
2	12"	1000.00, 1000.00
3	12"	1000.00, 1000.00
4	12"	1000.00, 1000.00
5	12"	1000.00, 1000.00
6	12"	1000.00, 1000.00
7	12"	1000.00, 1000.00
8	12"	1000.00, 1000.00
9	12"	1000.00, 1000.00
10	12"	1000.00, 1000.00
11	12"	1000.00, 1000.00
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13	12"	1000.00, 1000.00
14	12"	1000.00, 1000.00
15	12"	1000.00, 1000.00
16	12"	1000.00, 1000.00
17	12"	1000.00, 1000.00
18	12"	1000.00, 1000.00
19	12"	1000.00, 1000.00
20	12"	1000.00, 1000.00
21	12"	1000.00, 1000.00
22	12"	1000.00, 1000.00
23	12"	1000.00, 1000.00
24	12"	1000.00, 1000.00
25	12"	1000.00, 1000.00
26	12"	1000.00, 1000.00
27	12"	1000.00, 1000.00
28	12"	1000.00, 1000.00
29	12"	1000.00, 1000.00
30	12"	1000.00, 1000.00
31	12"	1000.00, 1000.00
32	12"	1000.00, 1000.00
33	12"	1000.00, 1000.00
34	12"	1000.00, 1000.00
35	12"	1000.00, 1000.00
36	12"	1000.00, 1000.00
37	12"	1000.00, 1000.00
38	12"	1000.00, 1000.00
39	12"	1000.00, 1000.00
40	12"	1000.00, 1000.00
41	12"	1000.00, 1000.00
42	12"	1000.00, 1000.00
43	12"	1000.00, 1000.00
44	12"	1000.00, 1000.00
45	12"	1000.00, 1000.00
46	12"	1000.00, 1000.00
47	12"	1000.00, 1000.00
48	12"	1000.00, 1000.00
49	12"	1000.00, 1000.00
50	12"	1000.00, 1000.00
51	12"	1000.00, 1000.00
52	12"	1000.00, 1000.00
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67	12"	1000.00, 1000.00
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71	12"	1000.00, 1000.00
72	12"	1000.00, 1000.00
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75	12"	1000.00, 1000.00
76	12"	1000.00, 1000.00
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78	12"	1000.00, 1000.00
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81	12"	1000.00, 1000.00
82	12"	1000.00, 1000.00
83	12"	1000.00, 1000.00
84	12"	1000.00, 1000.00
85	12"	1000.00, 1000.00
86	12"	1000.00, 1000.00
87	12"	1000.00, 1000.00
88	12"	1000.00, 1000.00
89	12"	1000.00, 1000.00
90	12"	1000.00, 1000.00
91	12"	1000.00, 1000.00
92	12"	1000.00, 1000.00
93	12"	1000.00, 1000.00
94	12"	1000.00, 1000.00
95	12"	1000.00, 1000.00
96	12"	1000.00, 1000.00
97	12"	1000.00, 1000.00
98	12"	1000.00, 1000.00
99	12"	1000.00, 1000.00
100	12"	1000.00, 1000.00

South Second Street
ROW + Easement abandonment request

Russell Street
ROW + Easement abandonment request

Russell Street
ROW abandonment request (easements to be retained)

ADVANCE COPY:
FOR REVIEW ONLY
PURPOSES ONLY

5.2 NDOT Collector and Local Street Speed Reduction Vision Zero Initiative:
5.2.1 CD 29: Anderson Rd from Priest Lake Dr to Couchville Pl —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.2 CD 02: Buena Vista Pk from Hummingbird Dr to Moormans Arm Rd —authorize reduction of posted speed limit from 40 mph to 35 mph;
5.2.3 CD 07: Broadmoor Drive from Gallatin Pk to Lemont Dr —authorize reduction of posted speed limit from 40 mph to 35 mph;
5.2.4 CD 06: Cahal Ave from Gallatin Ave to Porter Ave —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.5 CD 06: Davidson St from S 5 th St to S 14 th St —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.6 CD 30: Paragon Mills Rd from Nolensville Pk to Eisenhower Dr —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.7 CD 20: Robertson Ave from Annex Ave to Morrow Rd —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.8 CD 06: S 11th St from Woodland St to Shelby Ave —authorize reduction of posted speed limit from 35 mph to 25 mph;
5.2.9 CD 08: Smith Springs Rd from Philhall Pkwy to its eastern terminus —authorize reduction of posted speed limit from 35 mph to 30 mph;
5.2.10 CD 13: Thompson Pl from Patricia Dr to Goodbar Dr —authorize reduction of posted speed limit from 35 mph to 30 mph.

Analysis: Originating from NDOT’s Traffic Calming program, this initiative under Vision Zero selected streets that are ineligible for vertical calming measures (e.g., speed cushions, high traffic volumes, truck volumes, and speed limits) but still merited safety improvements in the form of speed limit reductions. The intent of these speed limit reductions on these selected streets is to create safer conditions for all street users including pedestrians, bicyclists, motorcyclists, transit riders, as well as drivers. Lower speeds on urban streets allow for longer reaction times and lower severity of injuries when crashes do occur, while minimally affecting travel times.

The new recommended speed limits are tabulated below. These were determined using procedures established by the National Cooperative Highway Research Program (NCHRP) Research Report 966, as is standard for NDOT. Considerations for the speed limit reductions included residential and commercial density, prevalence and severity of crashes, proximity to schools or parks, and comparisons to similar streets. Note that on Buena Vista Pike, NCHRP 966 criteria suggest keeping the posted speed limit at the current 40 mph. Due to its status as a collector street and its high crash rate, NDOT recommends a new posted speed limit of 35 mph.

Street	Speed		
	Current (mph)	NCHRP (mph)	NDOT Recommended (mph)
Anderson Road	35	30	30
Buena Vista Pike	40	40	35
Broadmoor Drive	35	30	30
Cahal Avenue	35	30	30
Davidson Street	35	30	30
Paragon Mills Road	35	30	30
Robertson Avenue	35	30	30
S 11 th Street	35	25	25
Smith Springs Road	35	30	30
Thompson Place	35	30	30

Recommendation: Approval of new NDOT recommended posted speed limits.

Regular Agenda

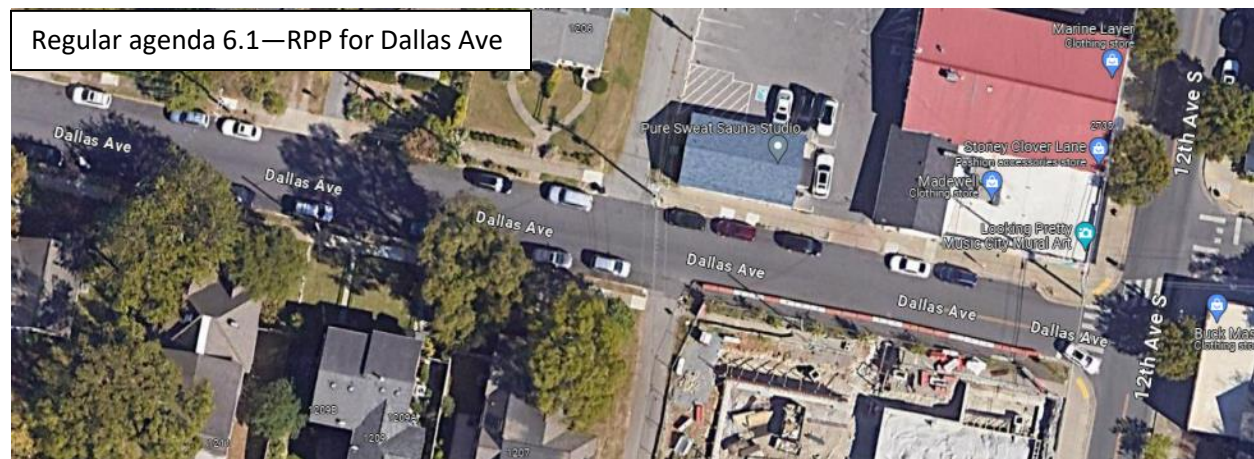
6.1 CD 18: Authorization for new Residential Permit Parking from 8AM—7PM / 7 days, on Dallas Ave between 12th Ave S and Belmont Blvd, requested by CM Cash.

Analysis: Residents of Dallas Ave live adjacent to commercial development on 12th Ave S and Belmont Blvd and are petitioning for residential permit parking from 8AM to 7PM, 7 days a week. The petition has the support of District 19 CM Tom Cash. The problem of commercial traffic encroaching into residential neighborhoods is exacerbated by increasingly intensive Twelve South development without the requisite parking requirements to support the development. There are existing Residential Permit Parking areas on the other side of 12th Ave S on Caruthers Ave and on Halcyon Ave, directly across from Dallas Ave. Expansion of RPP along the residential corridors poses a substantial risk that the commercial sites on 12th Ave S will eventually find themselves without sustainable parking for the businesses to thrive.

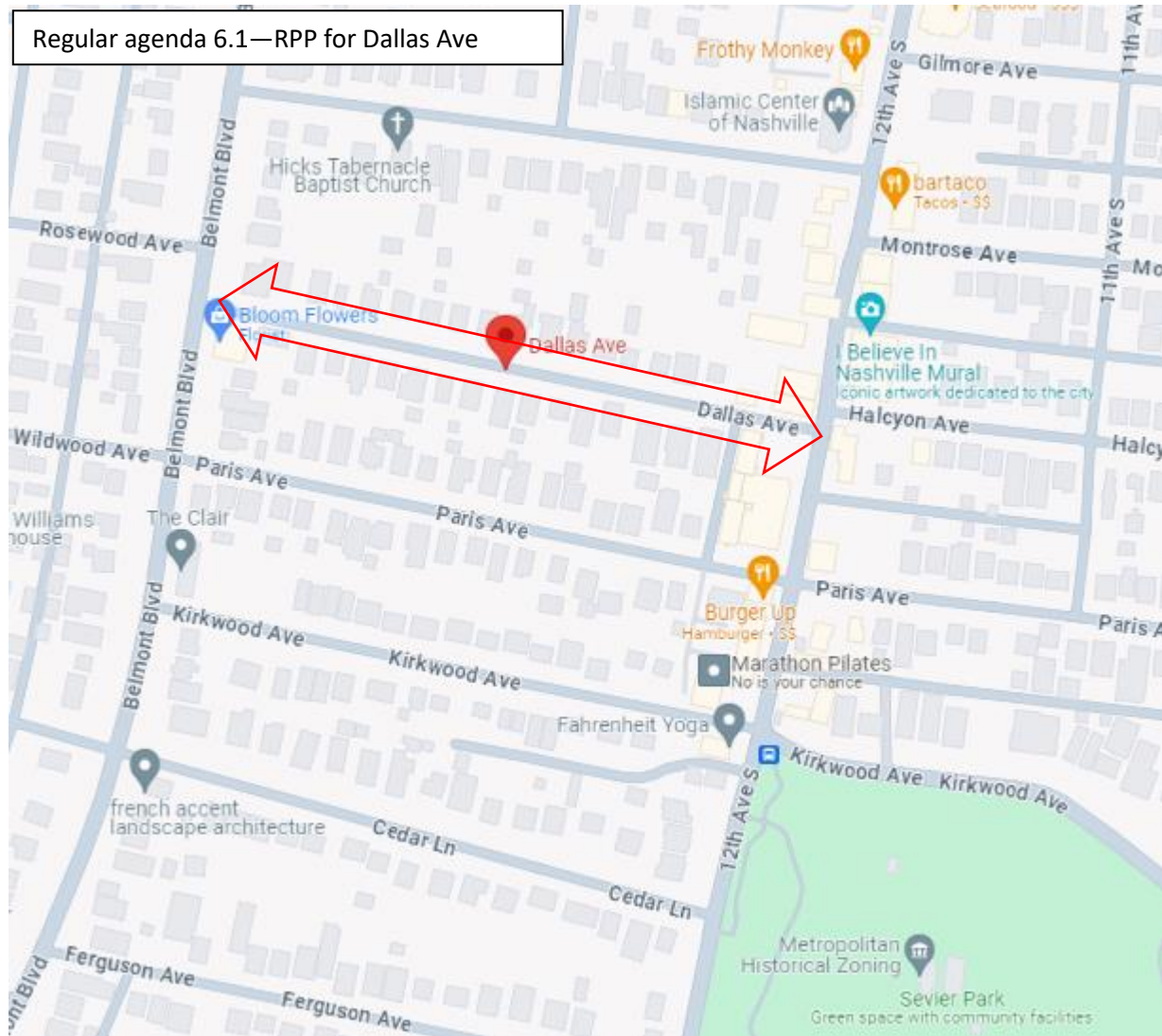
At least three of these criteria need to be met to establish a new Residential Permit Parking area:

- 1) Scarcity of convenient off-street parking for residents;*
- 2) Substantial use of neighborhood curb space by commuters and other non-residents for parking;*
- 3) A quality of life issue, e.g., trash left by other vehicles, neighborhood disruption after 10PM, etc.;*
- 4) Proximity of the neighborhood to major parking attractors such as employment centers, retail stores, restaurants, universities, hospitals, and tourist attractions;*
- 5) Documented public safety issues based on crime statistics and adverse crime in the neighborhood;*
- 6) Dense, historical neighborhoods with inadequate residential parking accommodations;*
- 7) Demonstrated adverse impact on community from economic initiatives;*
- 8) Consistency of proposed RPP regulation with adjacent streets and/or other parking districts.*

This proposed RPP meets criteria 1 (partially), 2, 4, and 6.



Regular agenda 6.1—RPP for Dallas Ave



Recommendation: Approval of Residential Permit Parking on Dallas Ave, 8AM—7PM / 7 days, from 12th Ave S to Belmont Blvd.

6.2 CD 18: Authorization to extend Residential Permit Parking 8AM—7PM Mon—Fri with 1-hour non-permit parking, on the west side of 26th Ave S between Acklen Ave and Fairfax Ave, requested by CM Cash.

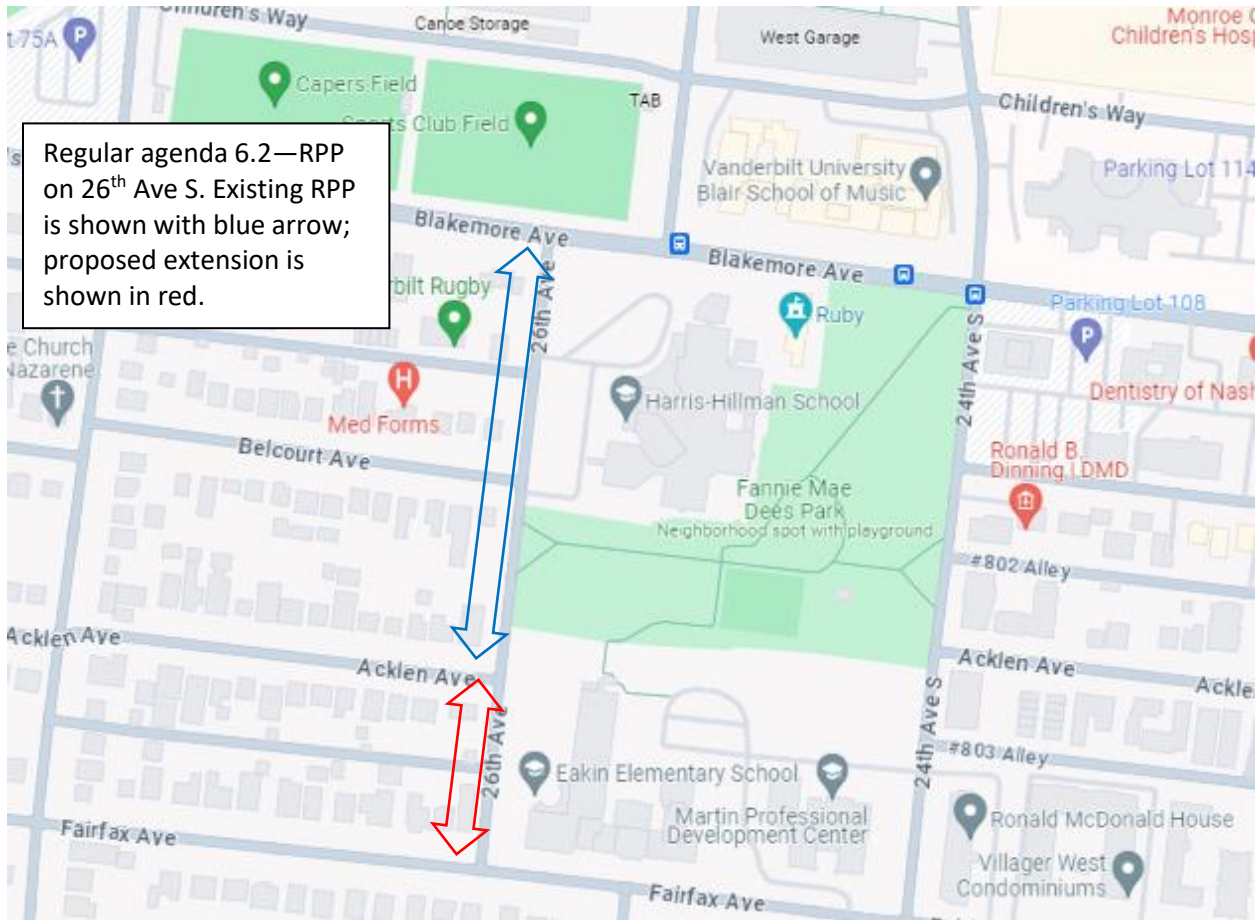
Analysis: The west side of 26th Ave S presently has Residential Permit Parking, 8AM—7PM Mon—Fri with a 1-hour limit for non-permit parking from Blakemore Ave to Acklen Ave. If approved, this request would extend the RPP area along 26th Ave S from Acklen Ave to Fairfax Ave to include two new residential properties.

At least three of these criteria need to be met to establish a new Residential Permit Parking area:

- 1) Scarcity of convenient off-street parking for residents;*
- 2) Substantial use of neighborhood curb space by commuters and other non-residents for parking;*
- 3) A quality of life issue, e.g., trash left by other vehicles, neighborhood disruption after 10PM, etc.;*
- 4) Proximity of the neighborhood to major parking attractors such as employment centers, retail stores, restaurants, universities, hospitals, and tourist attractions;*
- 5) Documented public safety issues based on crime statistics and adverse crime in the neighborhood;*
- 6) Dense, historical neighborhoods with inadequate residential parking accommodations;*
- 7) Demonstrated adverse impact on community from economic initiatives;*
- 8) Consistency of proposed RPP regulation with adjacent streets and/or other parking districts.*

This proposal for 26th Ave S meets criteria 2, 4, and 8 primarily due to Vanderbilt commuter traffic.





Regular agenda 6.2—RPP on 26th Ave S. Existing RPP is shown with blue arrow; proposed extension is shown in red.

Recommendation: Approval of RPP parking, 8AM—7PM, Mon—Fri with 1-hour non-permit parking on the west side of 26th Ave S from Acklen Ave to Fairfax Ave.

6.3 Notice to drivers about parking fines.

Last month the Commission asked to include an agenda item on parking fines. This agenda item will give the Commission the opportunity to ask questions about parking enforcement to the NDOT parking team. This is not a voting item.

6.4 On Street Metered Space Rental Fee policy.

Analysis: The proposed policy for on-street metered space rentals was formerly the informal “bagged meter policy” that had been previously used by Metro Public Works. The proposed policy on metered space rental establishes two uniform daily rates: one for the Central Business District, and the second for metered parking outside the CBD where meters are not enforced around the clock. The proposed policy will bring metered space rental (bagged meters) into a more consistent practice with other curb fees.

The proposed policy is provided as Attachment A to this analysis report.

Recommendation: Approval of the On Street Metered Space Rental Policy.

Unfinished Business

7.1 Valet Fee Policy revision.

Analysis: NDOT seeks to reduce the level of complexity of the existing valet fee structure with the goal of simplifying an, in most cases, reducing the calculated valet fees from the fee structure that was approved at the July 2021 T&P meeting. The revised policy will also eliminate Configuration 3 from the existing valet fee policy and will increase fees on those existing valets currently invoiced under Configuration 3. Configuration 3 was problematic in that it excluded lost parking meter revenues from consideration in the calculated fee structure. There are approximately 7 such valets lanes currently in use.

The proposed new policy will simplify and generally decrease the valet fees charged for valets operating in the public right-of-way. There is an accompanying draft council ordinance to amend Section 12.41.080(C) of the Metro Code to address valet application fees and right-of-way fees as set by the T&P Commission.

The proposed valet fee revisions would be used for new invoices for 2024 and going forward.

Attachment B is the current valet fee policy, approved in July 2021 by this Commission presented as information.

Attachment C is the revised valet fee policy presented for approval.

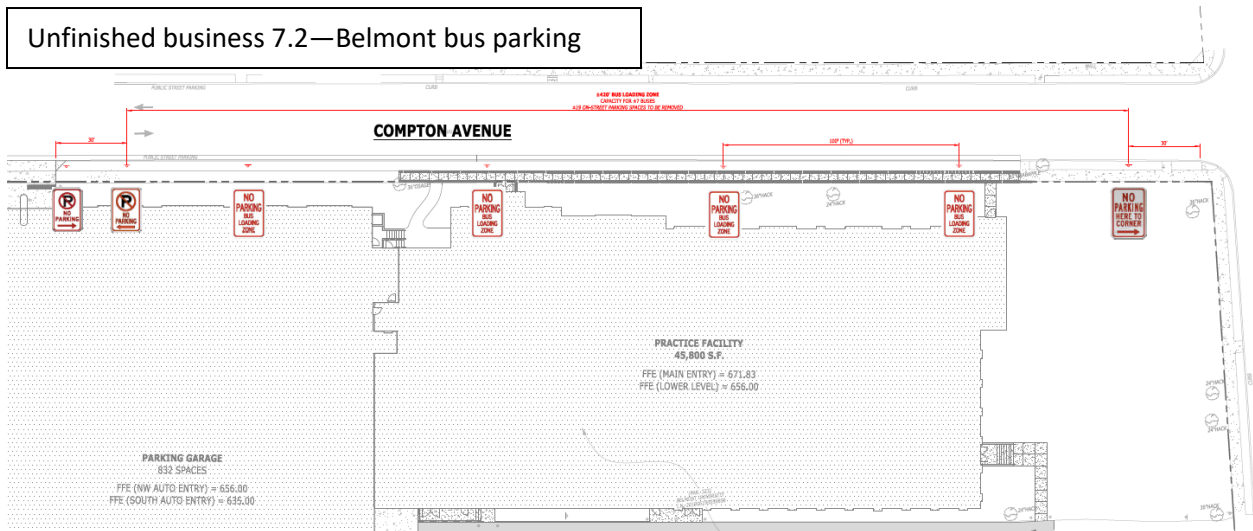
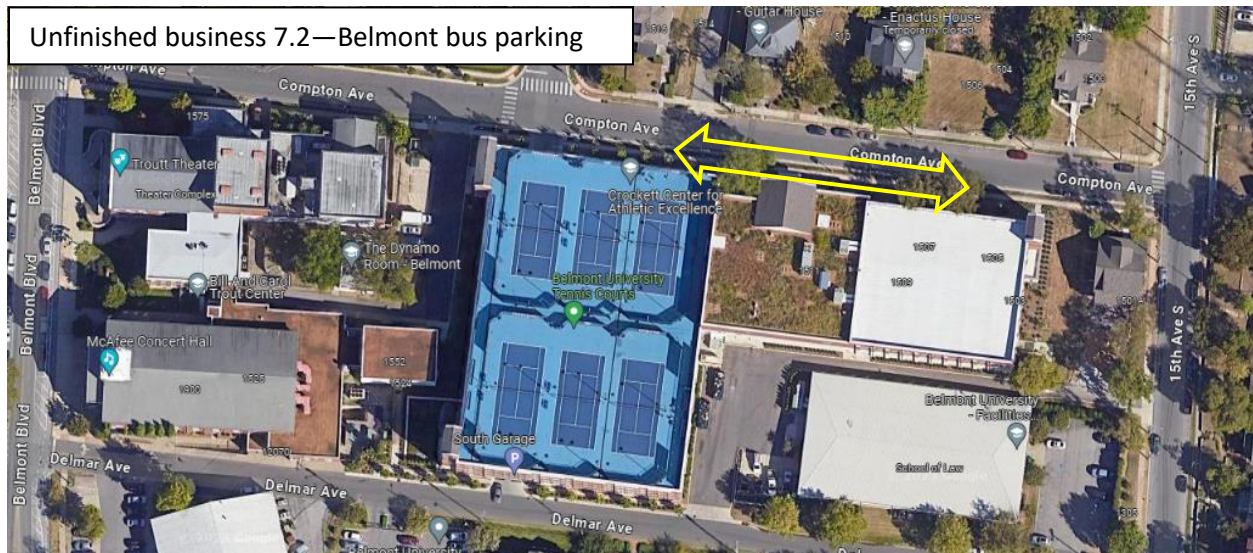
Attachment D is the NDOT policy for valet fees also presented for approval.

Attachment E is the draft council ordinance amending Section 12.41.080(C) of the Metropolitan Code of Laws and is presented for approval.

Recommendation: Approval of the revised fee policy (Attachment C), the NDOT fee policy (Attachment D), and the draft council ordinance (Attachment E).

7.2 CD 18: Authorization for a 420 ft bus-only parking zone 24/7 on the south side of Compton Ave between Belmont Blvd and 15th Ave S, requested by Belmont University.

Analysis: Belmont University recently completed construction of the Crockett Center on Compton Ave, including a parking garage. Compton Ave is configured for two travel lanes, and measures 32 ft from face of curb. This request is for a 420-ft +/- bus parking lane, to accommodate simultaneous storage of up to 7 bus vehicles. The equivalent to parking for about 19 passenger vehicle spaces.



Metro Code §12.48.10 gives authority to the Traffic & Parking Commission to establish passenger and freight loading zones. Section 12.48.030 restricts standing in a passenger loading zone to a period not exceeding three minutes. Section 12.48.050 restrictions standing in a freight loading zone to 30 minutes or less. The recommendation for bus parking instead of bus loading is to avoid loading zone time limits for bus vehicles attending Belmont events, as well as to reduce the likelihood of double

parking on Compton. Full size buses are unable to park inside the adjacent parking garage, and it's not feasible for bus passengers to embark or disembark within the 3-minute time limit for passenger loading zones.

Unfinished business 7.2—Belmont bus parking



Recommendation: Defer for one month, per the request from Belmont University for additional stakeholder engagement.

Attachment A:
On Street Metered Space Rental Fee Policy
Presented for approval

**NASHVILLE DEPARTMENT of TRANSPORTATION
& MULTIMODAL INFRASTRUCTURE**

INSTRUCTIONAL POLICY UPDATE (IPU): 2024

SECTION: 103 Curbside Operations	POLICY NUMBER: 103.2.2024
SUBJECT: On Street Metered Space Rental Fee	SUPERSEDES: 2021 calculation
SUBMITTED BY: NDOT – Parking Division REVIEWED BY: Diana Alarcon APPROVED BY: Diana Alarcon	APPROVED DATE: 1/4/2024
APPLICABLE CODES/ORDINANCES: Existing rate of \$21 per space/day	

EFFECTIVE DATE: 2/15/2024

PURPOSE: To Establish Cost per on-street parking space in CBD and NON-CBD areas

PROCEDURE: Daily Parking Metered space fees are to be calculated by the following formula:

(T x D) x U, where:

T = The established hourly rate for CBD or NON-CBD

D = Number of hours in a day

U = Flat Utilization rate of 65%

CBD: \$2.25/hr x 24 hrs = \$54 x 0.65 occupancy = \$35

Non-CBD: \$1.75/hr x 24 hrs = \$42 x 0.65 occupancy = \$28

CBD = \$35/Day

NON-CBD = \$28/Day

Attachment B:
Current Valet Fee Policy, approved July 2021
Presented for information

Valet Fee Policy

(Revised February 2021)

It is widely recognized that Nashville's on-street parking operations are past due for an overhaul and that new technologies and procedures related to collections and enforcement are needed. While more curb use policy changes are expected in 2021, the intent of this policy is to define Metro's valet fees in the meantime.

In December 2019, questions arose as to the interpretation and implementation of Metro's valet fee policy. The intent of this memo is to define Public Works' future implementation of this code.

Metro's Objective

Valet parking operations are a critical part of business in Nashville's urbanized areas. Because of space limitations, valet stands are often required to be located within the public rights-of-way, usually at an on-street, curbside location. This public right-of-way is maintained by taxpayers and the allowance of private commerce in the form of valet parking is governed by Metro Code 12.41.080C:

The fee for a valet parking permit shall be fifty dollars, plus revenue lost annually for each required metered space as measured by the hourly rate for each metered space. All fees are payable in advance.

Metro Public Works has the responsibility to implement this ordinance fairly and otherwise manage activities of the public right-of-way and curbside.

Current Approach and Problems

Code 12.41.080 has been previously interpreted to mean that, if parking meters are taken out of service to accommodate a valet stand, then the applicant of the valet stand will pay a \$50 fee plus the cost of the revenue lost for the meters being out of service.

Recently, however, several businesses have requested the removal of parking meters for other reasons (construction activities, loading zones, etc.), but not valet. Depending on the use of these spaces, there is either no fee for this, or the fees are incorporated into other permits. Some time later, a valet operator will apply for a stand at the request of the business. Since there is no meter to be removed, there is no lost revenue and the only fee owed is the \$50 annual permit fee. This procedure results in a loss for Metro and does not adequately structure the curbside value.

Furthermore, the method for determining what is the "revenue lost annually" has never been defined.

Policy Development

After repeated concerns about valet issues were raised by the Traffic & Parking Commission over the past two years, in October 2020, a focus group was established to provide comment on the issue, beginning with a review of a draft document that had been developed by Public Works staff in late 2019. Members of this working group were:

Theresa Costonis, Metro Legal Department
Faye DiMassimo and Mary Beth Ikard, Office of Mayor John Cooper
Sean Parker, Council District 5
Tom Turner and Crissy Cassetty, Nashville Downtown Partnership
Betsy Williams, Traffic & Parking Commissioner and downtown business owner
Tim Wilson, Parking Management Company

With guidance from the focus group, the policy was shaped by evaluating data from Nashville’s current valet and parking meter revenues as well as valet fee policies from other US cities (Atlanta, Austin, Charlotte, Columbus, Denver, and Memphis).

Recommended Procedure

The intent of the ordinance is for Metro to recoup the opportunity cost introduced by curbside valet operations and help fairly structure this in-demand curb space. The fee should help structure the regulatory principles behind good curb management and resulting impacts on business and transportation.

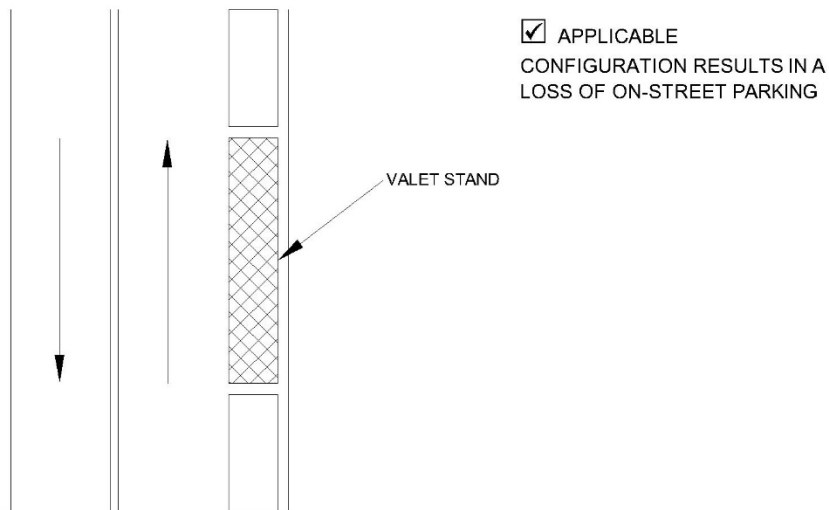
Applicability

Any new or existing valet zone within the public right-of-way or which otherwise impedes public access to the curbside for valet operations within Davidson County.

Specifically, potential valet configurations are shown below, along with guidance on whether or not they would be subject to this valet policy.

Configuration 1: Standard on-street valet stand. Here, a valet stand would replace standard on-street parking. This configuration is subject to the lost revenue portion of the fee.

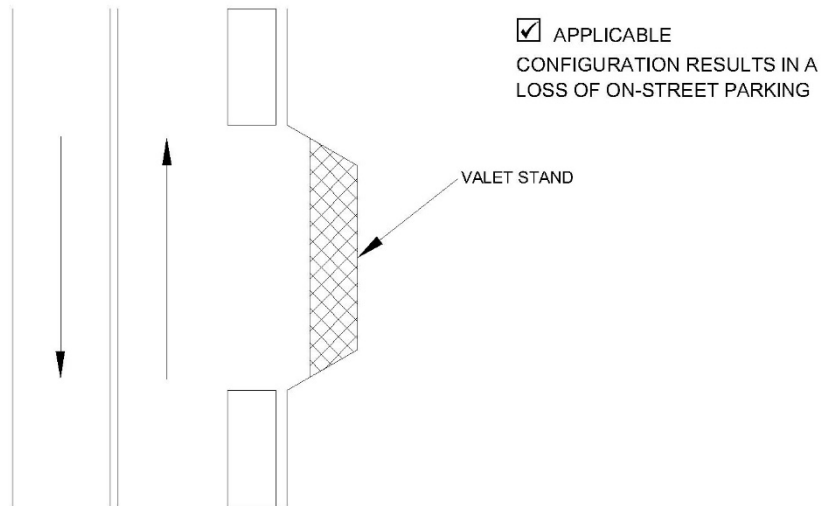
Configuration 1: Standard on-street valet stand



Configuration 2: Cut-out valet stand (either on- or off-ROW). Here, a development constructs a roadway cut-out in which valet operations will occur. However, since this cut-out would replace existing on-street parking, the lost revenue portion of the fee still applies.

Configuration 2:

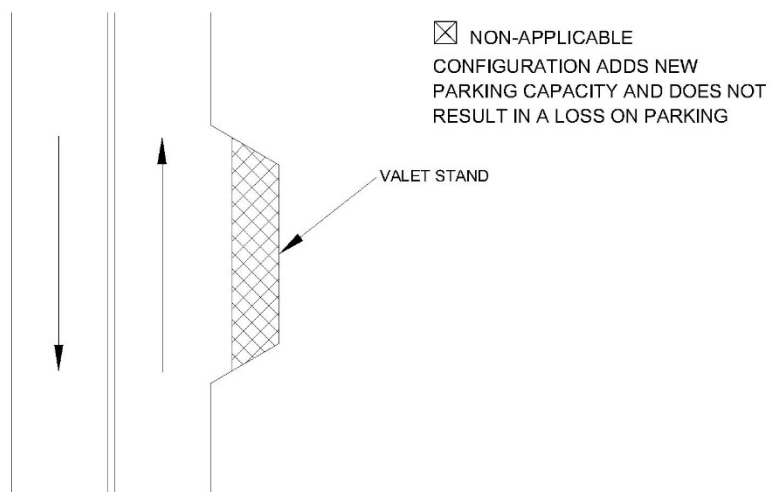
Cut-out valet stand (either on- or off-ROW)



Configuration 3: Cut-out valet stand with no loss of parking (either on- or off-ROW). Here, a similar roadway cut-out is used, but on a street that does not otherwise have on-street parking. Since no parking is displaced, this configuration is not subject to the lost revenue portion of the fee.

Configuration 3:

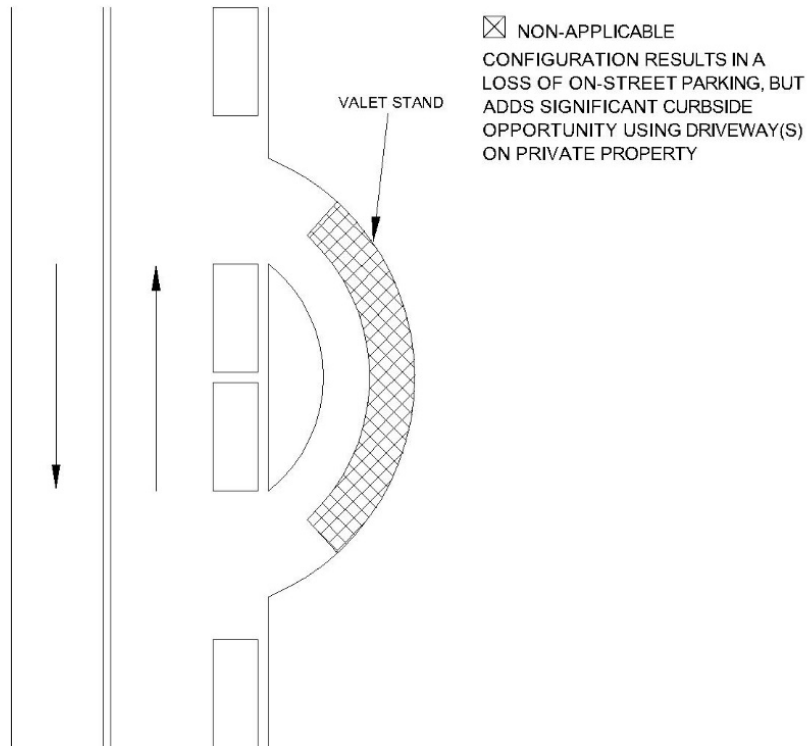
Cut-out valet stand with no loss of parking (either on- or off-ROW)



Configuration 4: Driveway serving off-ROW valet stand. Valet operations occurring off of the public rights-of-way may not be subject to a valet permit at all. Even if the required access displaces on-street parking, this configuration is considered a driveway permit and not related to valet permitting.

Configuration 4:

Driveway serving off-ROW valet stand



Determining whether “lost parking revenue” applies

The issuance of a valet permit may or may not result in physical removal of a parking meter, but generally does result in loss of public parking opportunities or other curbside functions to the benefit of the private business. The valet applicant will be assessed the lost parking revenue (calculated in the following section) if all of the following conditions are true:

1. The curb scenario of the proposed valet is defined as either Configuration 1 or 2, as shown above.
2. The proposed valet is located within Metro’s meter zone, as shown in Attachment A. The blue area defines the central business district (CBD), and the green area defines the non-CBD.
3. The proposed valet is located on a street that has at least one parking meter elsewhere on that street. A list of streets with meters is provided as Attachment B. This listing may change if new meters are added on a street.

Annual valet fees are due on January 1 in advance of the year of operation. This new fee structure will be applied to all new valet applications approved during 2021 and will be prorated if necessary.

Fee

The annual fee for valet zones will be \$50 plus lost parking revenue, as calculated below:

Annual Valet Fee = $\$50 + 35\%(N_1 \times T \times R) + 50\%(N_2 \times T \times R) + 100\%(N_3 \times T \times R)$, where:

$N_1 = 2$ = number of spaces requested (min of two)

N_2 = number of additional spaces (1-2 additional, 3-4 total)

N_3 = number of additional spaces (more than 4 total)

T = weekly number of hours that meters are in service while valet is in effect¹

R = hourly parking rate over course of one year²

Fee Examples:

Midtown restaurant with a four-space valet stand operating 6:00 PM – midnight, 7 days.

$$\text{Annual fee} = \$50 + 35\%(2 \times 0 \times \$87.50) + 50\%(2 \times 0 \times \$87.50) = \$50$$

Downtown restaurant with a two-space valet stand operating 4:00 PM – 10:00 PM Thurs-Sun.

$$\text{Annual fee} = \$50 + 35\%(2 \times 6 \times \$112.50) = \$50 + \$472.50 = \$522.50$$

Midtown hotel with a two-space valet stand operating 24 hours, 7 days.

$$\text{Annual fee} = \$50 + 35\%(2 \times 60 \times \$87.50) = \$50 + \$3,675 = \$3,725$$

Downtown restaurant with a seven-space valet stand operating noon – midnight, 7 days.

$$\begin{aligned} \text{Annual fee} &= \$50 + 35\%(2 \times 36 \times \$112.50) + 50\%(2 \times 36 \times \$112.50) + 100\%(3 \times 36 \times \$112.50) \\ &= \$50 + \$2,835 + \$4,050 + \$12,150 = \$19,085 \end{aligned}$$

Summary

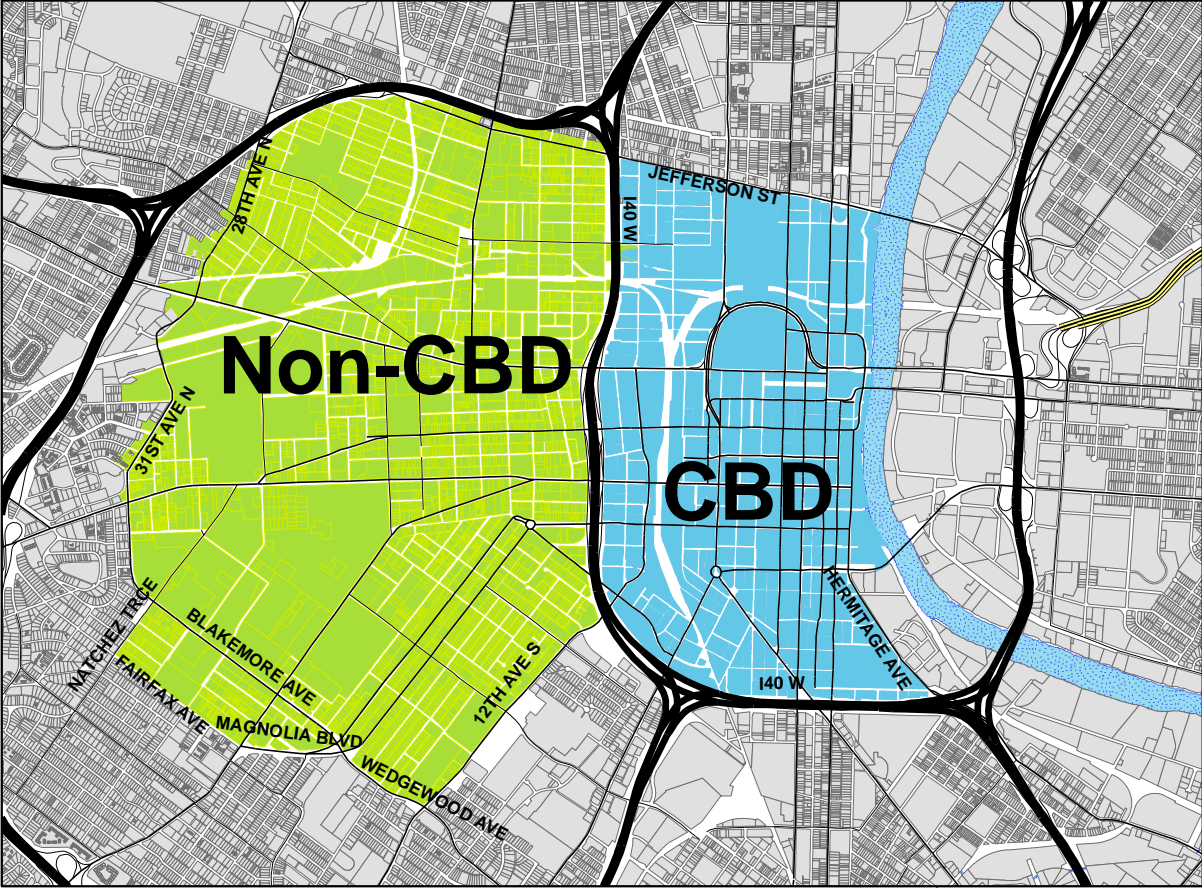
Working with a focus group and informed by both Nashville and peer-city data, a formula which defines Metro Code 12.41.080 has been developed. This formula is in keeping with a reasonable interpretation of existing Metro Code as well as brings Nashville’s valet fees into closer alignment with peer best practices. It also has the effect of reinforcing necessary regulatory policy. Specifically, a “right-sized” valet zone promotes efficient curb use, while over-dedicating curb space to valet zones can lead to underutilized curb lanes and less available on-street parking.

The new formula will become effective for all 2021 valet permits and permit renewals.

¹ Effective hours may change, but at time of writing are 8:00 AM – 6:00 PM, Mon-Sat. This means that T = 0-60.

² Rates may change, but at time of writing, R = \$112.50 in CBD and \$87.50 outside of CBD, calculated as 50 x \$2.25 in CBD and 50 x \$1.75 in non-CBD.

Attachment A
Metro's Parking Zones (area of applicability)



Attachment B

Applicable Streets* (streets which have at least one parking meter)

1ST AVE	JESS NEELY DR
2ND AVE	KOREAN VETERANS BLVD
3RD AVE	LAUREL ST
4TH AVE	LEA AVE
5TH AVE	LOUISE AVE
6TH AVE	LYLE AVE
7TH AVE	MCLEMORE ST
9TH AVE	PATTERSON ST
10TH AVE	PINE ST
11TH AVE	POLK AVE
12TH AVE	REIDHURST AVE
16TH AVE	ROSA L PARKS AVE
18TH AVE	ROSA L PARKS BLVD
19TH AVE	SCARRITT PL
20TH AVE	STATE ST
21ST AVE	TERRACE PL
22ND AVE	UNION ST
23RD AVE	WEST END AVE

24TH AVE
25TH AVE
29TH AVE
30TH AVE

*Subject to change as
parking meters are
added/removed

ADELICIA ST
ALMOND ST
BANK ST
BELCOURT AVE
BROADWAY
CAPERS AVE
CAPITOL BLVD
CHARLOTTE AVE
CHET ATKINS PL
CHILDRENS WAY
CHURCH ST
CLARK PL
COMMERCE ST
DEMONBREUN ST
DIVISION ST
ELLISTON PL
GARLAND AVE
GAY ST
GEORGE L DAVIS BLVD
GLEAVES ST
GRAND AVE
HAYES ST
JAMES ROBERTSON PKWY

Attachment C:
Proposed Revision to Valet Fee Policy
Presented for approval

Valet Fee Policy

(Revised February 2021, December 2023 & Proposed February 2024)

It is widely recognized that Nashville's on-street parking operations are past due for an overhaul and that new technologies and procedures related to collections and enforcement are needed. While more curb use policy changes are expected in 2024, the intent of this policy is to define Metro's valet fees in the meantime.

In December 2019, questions arose as to the interpretation and implementation of Metro's valet fee policy. The intent of this memo is to define NDOT's future implementation of this code. In December 2023, this policy was revised to delete Configuration 3 from page 3 and to modify the guidance determining lost revenue applicability on page 4.

Metro's Objective

Valet parking operations are a critical part of business in Nashville's urbanized areas. Because of space limitations, valet stands are often required to be located within the public rights-of-way, usually at an on-street, curbside location. This public right-of-way is maintained by taxpayers and the allowance of Valet parking permit applicants shall be charged an application fee plus additional fees for use of the public right-of-way, as set by the Traffic and Parking Commission. All fees shall be paid in advance.

NDOT has the responsibility to implement this ordinance fairly and otherwise manage activities of the public right-of-way and curbside.

Current Approach and Problems

Code 12.41.080 has been previously interpreted to mean that, if parking meters are taken out of service to accommodate a valet stand, then the applicant of the valet stand will pay a \$50 fee plus the cost of the revenue lost for the meters being out of service.

Recently, however, several businesses have requested the removal of parking meters for other reasons (construction activities, loading zones, etc.), but not valet. Depending on the use of these spaces, there is either no fee for this, or the fees are incorporated into other permits. Sometime later, a valet operator will apply for a stand at the request of the business. Since there is no meter to be removed, there is no lost revenue and the only fee owed is the \$50 annual permit fee. This procedure results in a loss for Metro and does not adequately structure the curbside value.

Furthermore, the method for determining what is the "revenue lost annually" has never been defined.

Policy Development

After repeated concerns about valet issues were raised by the Traffic & Parking Commission over the past two years, in October 2020, a focus group was established to provide comment on the issue, beginning with a review of a draft document that had been developed by NDOT staff in late 2019. Members of this working group were:

Theresa Costonis, Metro Legal Department
Faye DiMassimo and Mary Beth Ikard, Office of Mayor John Cooper
Sean Parker, Council District 5
Tom Turner and Crissy Cassetty, Nashville Downtown Partnership
Betsy Williams, Traffic & Parking Commissioner and downtown business owner
Tim Wilson, Parking Management Company

With guidance from the focus group, the policy was shaped by evaluating data from Nashville’s current valet and parking meter revenues as well as valet fee policies from other US cities (Atlanta, Austin, Charlotte, Columbus, Denver, and Memphis).

Recommended Procedure

The intent of the ordinance is for Metro to recoup the opportunity cost introduced by curbside valet operations and help fairly structure this in-demand curb space. The fee should help structure the regulatory principles behind good curb management and resulting impacts on business and transportation.

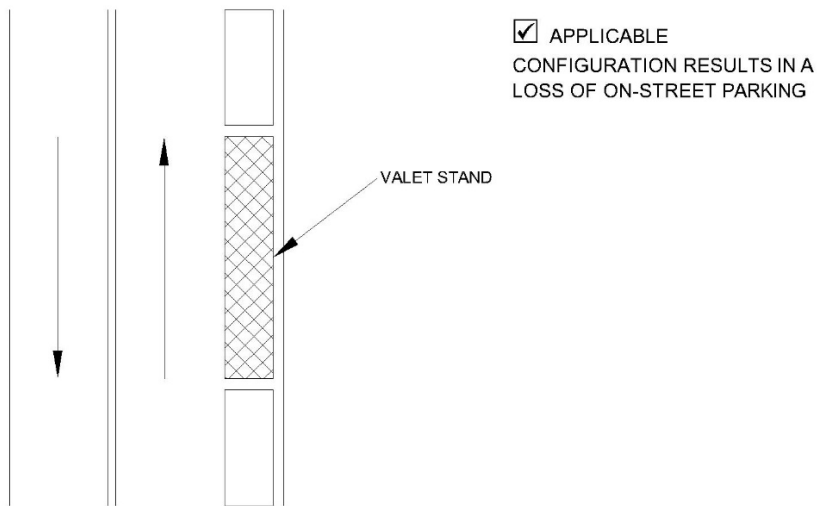
Applicability

Any new or existing valet zone within the public right-of-way or which otherwise impedes public access to the curbside for valet operations within Davidson County.

Specifically, potential valet configurations are shown below, along with guidance on whether or not they would be subject to this valet policy.

Configuration 1: Standard on-street valet stand. Here, a valet stand would replace standard on-street parking. This configuration is subject to the lost revenue portion of the fee.

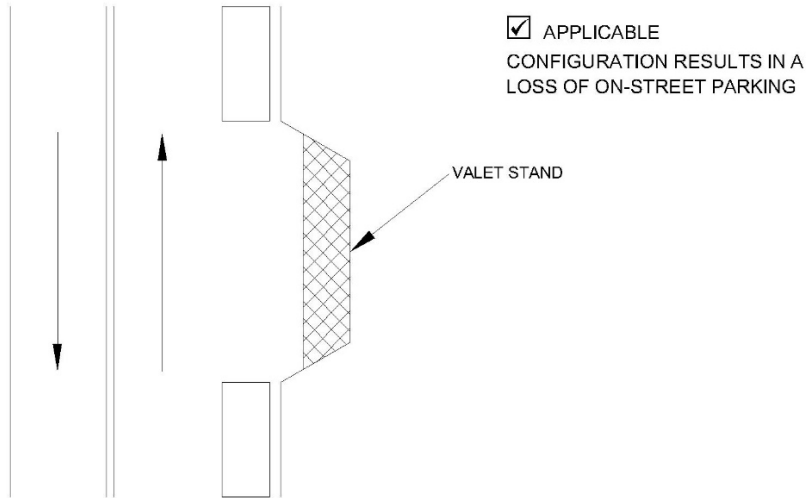
Configuration 1: Standard on-street valet stand



Configuration 2: Cut-out valet stand (either on- or off-ROW). Here, a development constructs a roadway cut-out in which valet operations will occur. However, since this cut-out would replace existing on-street parking, the lost revenue portion of the fee still applies.

Configuration 2:

Cut-out valet stand (either on- or off-ROW)



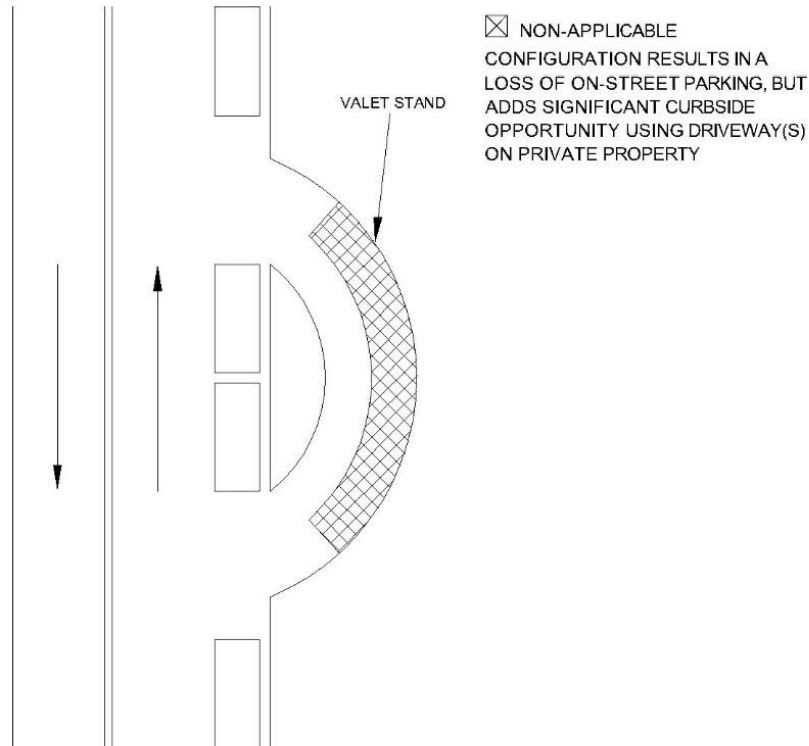
jasmith
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Configuration 3 removed December 2023.

Configuration 4: Driveway serving off-ROW valet stand. Valet operations occurring off of the public rights-of-way may not be subject to a valet permit at all. Even if the required access displaces on-street parking, this configuration is considered a driveway permit and not related to valet permitting.

Configuration 4:

Driveway serving off-ROW valet stand



Determining whether “lost parking revenue” applies

The issuance of a valet permit may or may not result in physical removal of a parking meter, but generally does result in loss of public parking opportunities or other curbside functions to the benefit of the private business. The valet applicant will be assessed the lost parking revenue (calculated in the following section) if all of the following conditions are true:

1. The curb scenario of the proposed valet is defined as either Configuration 1 or 2, as shown above.
2. The proposed valet is located within Metro’s meter zone, as shown in Attachment A; but not limited to these zones. The blue area defines the central business district (CBD), and the green area defines the non-CBD.
3. The proposed valet is located on a street that has at least one parking meter elsewhere on that street. A list of streets with meters is provided as Attachment B; but not limited to these streets only.

Annual valet fees are due on January 1 in advance of the year of operation. This new fee structure will be applied to all new valet applications approved during 2021 and will be prorated if necessary.

Fee Calculations

Annual Valet Permit fees are to be calculated by the following formula only:

$$\mathbf{\$50 + (N \times TCBD/TNCBD \times D) \times U, \text{ where:}}$$

\$50 = base application fee

N = number of approved metered spaces at 22Ft each

TCBD = Hours of operation per day in CBD core areas (Downtown, Gulch & Sobro...)

\$11 for 0-8 hours/day operation.

\$23 for 8-16 hours/day operation.

\$35 for 16+ hours/day operation.

TNCBD = Hours of operation per day in NON-CBD core areas (Midtown, Edgehill, Hillsboro Village & Music Row...)

\$9 for 0-8 hours/day operation.

\$18 for 8-16 hours/day operation.

\$28 for 16+ hours/day operation.

D = days in a calendar year

U = flat 20% utilization rate of 0.20 for both, Hotels and Restaurants

FEE Examples:

HOTEL:

Downtown Hotel Valet with four-spaces operating 24/7:

$$\$50 + (4 \times \$35 \times 365) \times 0.2 = \$10,270$$

Downtown Hotel Valet with four-spaces operating from 8AM to 6PM:

$$\$50 + (4 \times \$23 \times 365) \times 0.2 = \$6,766$$

Downtown Hotel Valet with four-spaces operating from 8AM to 3PM:

$$\$50 + (4 \times \$11 \times 365) \times 0.2 = \$3,262$$

Midtown Hotel Valet with four-spaces operating 24/7:

$$\$50 + (4 \times \$28 \times 365) \times 0.2 = \$8,226$$

Midtown Hotel Valet with four-spaces operating from 8AM to 6PM:

$$\$50 + (4 \times \$18 \times 365) \times 0.2 = \$5,306$$

Midtown Hotel Valet with four-spaces operating from 8AM to 3PM:

$$\$50 + (4 \times \$9 \times 365) \times 0.2 = \$6,678$$

Restaurant:

CBD Restaurant Valet Operating with two-spaces from 5PM to 12AM:

$$\$50 + (2 \times \$11 \times 365) \times 0.2 = \$1,656$$

Midtown Restaurant Valet Operating with two-spaces from 5PM to 12AM:

$$\$50 + (2 \times \$9 \times 365) \times 1 = \$1,314$$

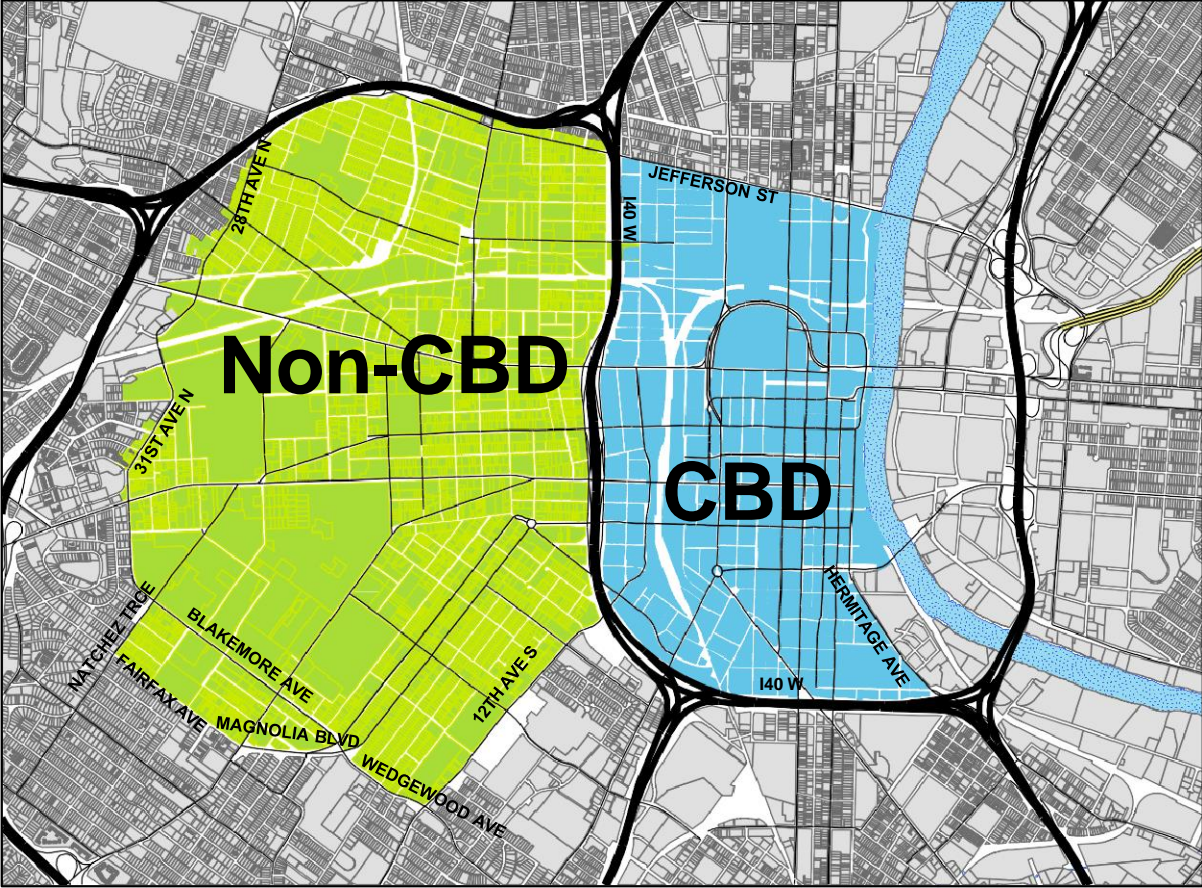
*****The day multiplier “D” is reduced based on actual days operations / year.**

Summary

Working with a focus group and informed by both Nashville and peer-city data, a formula which defines Metro Code 12.41.080 has been developed. This formula is in keeping with a reasonable interpretation of existing Metro Code as well as brings Nashville’s valet fees into closer alignment with peer best practices. It also has the effect of reinforcing necessary regulatory policy. Specifically, a “right-sized” valet zone promotes efficient curb use, while over-dedicating curb space to valet zones can lead to underutilized curb lanes and less available on-street parking.

The new formula will become effective for all 2024 valet permits and permit renewals.

Attachment A
Metro's Parking Zones (area of applicability)



Attachment B

Applicable Streets* (streets which have at least one parking meter)

1ST AVE	JESS NEELY DR
2ND AVE	KOREAN VETERANS BLVD
3RD AVE	LAUREL ST
4TH AVE	LEA AVE
5TH AVE	LOUISE AVE
6TH AVE	LYLE AVE
7TH AVE	MCLEMORE ST
9TH AVE	PATTERSON ST
10TH AVE	PINE ST
11TH AVE	POLK AVE
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DIVISION ST	
ELLISTON PL	
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GAY ST	
GEORGE L DAVIS BLVD	
GLEAVES ST	
GRAND AVE	
HAYES ST	
JAMES ROBERTSON PKWY	

Attachment D:
Proposed NDOT Policy for Valet Fees
Presented for approval

**NASHVILLE DEPARTMENT of TRANSPORTATION
& MULTIMODAL INFRASTRUCTURE**

INSTRUCTIONAL POLICY UPDATE (IPU): 2024

SECTION: 103 Curbside Operations	POLICY NUMBER: 103.1.2024
SUBJECT: Valet Parking Permit Fees	SUPERSEDES: 2021 calculation
SUBMITTED BY: NDOT – Parking Division REVIEWED BY: Diana Alarcon APPROVED BY: Diana Alarcon	APPROVED DATE: 1/4/2024
APPLICABLE CODES/ORDINANCES: Valet Fee Policy of 2021, Chapter 12.41.010 -110	

EFFECTIVE DATE: 2/12/2024

PURPOSE: To establish New Valet Parking Permit Fees for 2024

PROCEDURE:

Annual Valet Permit fees are to be calculated by the following formula only:

$$\mathbf{\$50 + (N \times TCBD/TNCBD \times D) \times U, \text{ where:}}$$

\$50 = base application fee

N = number of approved metered spaces at 22Ft each

TCBD = Hours of operation per day in CBD core areas (Downtown, Gulch & Sobro...)

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*****The day multiplier "D" is reduced based on actual days operations / year.**

Attachment E:
Draft Metro Council Ordinance amending §12.41.080(C)
Presented for approval

ORDINANCE NO. _____

An ordinance amending Section 12.41.080(C) of the Metropolitan Code of Laws to allow the Metropolitan Government, acting by and through the Nashville Department of Transportation and Multimodal Infrastructure (NDOT), to charge and collect fees for use of the public right-of-way, in connection with applications for valet parking permits.

WHEREAS, pursuant to Section 12.41.030 of the Metro Code, NDOT must issue parking permits to valet parking operators to allow them to conduct their operations on public streets; and,

WHEREAS, a separate parking permit is required for each location where valet parking services are provided; and,

WHEREAS, NDOT seeks to amend Section 12.41.080(C) of the Code to clarify its authority to charge and collect application fees and fees for the use of the public right-of-way from applicants for valet parking permits;

WHEREAS, it is in the best interest of the Metropolitan Government that the amendment be approved.

NOW, THEREFORE, BE IT ENACTED BY THE COUNCIL OF THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY:

Section 1. That Metropolitan Code of Laws Section 12.41.080(C) is hereby amended by deleting the section in its entirety and replacing it with the following:

- C. Valet parking permit applicants shall be charged an application fee plus additional fees for use of the public right-of-way, as set by the Traffic and Parking Commission. All fees shall be paid in advance.

Section 2. This Ordinance shall take effect from and after its final passage, the welfare of the Metropolitan Government of Nashville and Davidson County requiring it.

RECOMMENDED BY:

INTRODUCED BY:

 Diana W. Alarcon, Director
 Nashville Department of Transportation
 And Multimodal Infrastructure

APPROVED AS TO AVAILABILITY OF FUNDS:

Member(s) of Council

 Kevin Crumbo, Director
 Department of Finance

APPROVED AS TO FORM
AND LEGALITY:

Assistant Metropolitan Attorney