

Hello Sean,

On behalf of Riverside Avondale Preservation, I am writing to urge you to provide reasonable limitations (conditions) on the AD-19-44 for Southern Grounds Avondale. RAP has considered the application and advocates for a seat count of 128, versus the 163 proposed by the applicant. In determining this number, we have used a sound methodology that directly relates the seat count to historical parking allowances and the four new spaces to be constructed behind the building.

We read the staff report and feel it has several omissions and errors that should be considered in determining whether the application meets the criteria.

The Planning and Development Department staff report recommends approval with no conditions. In the report, the department says the project "is consistent with the Riverside Avondale Overlay." However, the Overlay includes the subsequent legislation of 2012-339 (2) (b) which clearly states the requirement that any restaurant over 100 seats must meet required minimum parking, which is 50% of the minimum requirements of the Zoning Code. (The legislation provides for contributing structures of less than 2500 square feet or 100 seats to have zero parking requirements.) These parking standards were carefully crafted in a long-running consensus-based planning effort in developing the Zoning Overlay legislations, and RAP does not support wholly disregarding such rules.

It is important to note that the size of the restaurant is discretionary, and therefore the size of the parking hardship is self-imposed. This establishment will have floor space of over 7000 square feet (8700 all in), and the proposal is for 163 seats, which would make it the fourth largest in Avondale behind Mellow Mushroom(204), Blue Fish (200+), and Mojoes (185). Southern Grounds successfully operates with 120 seats or fewer in Neptune Beach and San Marco.

The PD report does not recognize the impact of increasing the existing parking deficit in the Shoppes of Avondale. The 2014 Parking Study conducted by Ghyabi and Associates, funded and led by the City of Jacksonville, identified a clear deficit and impacts to the area. Since Southern Grounds will operate until 10 p.m. each day, their operational hours will span both peak times of lunch and dinner. In addition to the identified deficit in the study, approximately 400 restaurant seats have been added to the Shoppes since the study was done, and only 20 on site spaces (for Mellow, required as a condition of their AD).

The staff report goes on to say that there is "ample parking along the side streets," which is not supported by evidence. The residential streets Pine Street, Riverside Avenue, Talbot and St. Johns past the Shoppes are used every day and evening for commercial parking (customers and employees), and will further encroach on the quality of life and safety (due to cars circling, late night employees and customers, reduction of ability for residents and their guests to park on their own streets, etc.)

Finally, the report is not consistent with other recent Planning Department reports. In 2016, the Planning Department recommended denial for a request for a deviation from 10 spaces to 0 for the 125 seat Barrique restaurant (AD-16-51), which is just across the street. This application was subsequently approved by Planning Commission, appealed by a resident, and then settled with the provision for off-street parking for employees. In 2018, the Planning Department recommended denial for AD-18-39 for 24 to 4 for Spirit Animal in Five Points. This application was approved by the Planning Commission, and after an appeal, the application was denied (appeal upheld) at the Land Use and Zoning Committee and City Council.

For the Southern Grounds restaurant in San Marco, AD-17-57 was approved with seven on-site parking spaces and a condition to provide 22 additional spaces in a nearby lot across the tracks. This application stated that the restaurant would have 60 seats maximum indoors and outside. On a recent Thursday at 12 noon, 32 cars were parked in these two over-full lots, with approximately 48 customers, or 1.5 customers per car.

We would like to know what conditions have changed since these decisions that would make the Planning Department completely depart from previous recommendations.

It is unreasonable to think that the Shoppes can accommodate a new 163 seat restaurant with as many as 24 (or likely more) additional cars, without an adverse impact on existing business establishments and on existing nearby residents.

RAP looks to the City to make decisions that reflect consideration not just for new development, but for existing retailers, restaurants and residents that must share the limited parking supply.

Limitations are reasonable and will mitigate adverse effects of this, and future AD applications. We urge you to reduce the seat count accordingly.

Nancy

Nancy Powell
Board Chair, Riverside Avondale Preservation