

**Atijera, Evamarie (CPC)**

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**From:** David Silverman <dsilverman@reubenlaw.com>  
**Sent:** Monday, March 13, 2017 10:55 AM  
**To:** Ajello Hoagland, Linda (CPC)  
**Cc:** Atijera, Evamarie (CPC)  
**Subject:** LOD - Harrison Metals, 3030 17th Street

R# 2017-001520 ZAD  
WITHDRAWN

Linda This lease negotiation has fallen through. We withdraw the request for LOD. Thank you for your helpful assistance. David

**REUBEN, JUNIUS & ROSE, LLP**

David Silverman  
One Bush Street, Suite 600  
San Francisco, CA 94104  
T. 415-567-9000 F. 415-399-9480  
dsilverman@reubenlaw.com  
WWW.REUBENLAW.COM

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**From:** Ajello Hoagland, Linda (CPC) [mailto:linda.ajellohoagland@sfgov.org]  
**Sent:** Friday, March 10, 2017 7:18 AM  
**To:** David Silverman <dsilverman@reubenlaw.com>  
**Subject:** RE: LOD - Harrison Metals, 3030 17th Street

Hi David,

I just spoke to the ZA and he still needs some additional information, as follows:

- Please provide a floor plan showing the layout of the manufacturing component of the business, including equipment layout, etc.
- Provide information on the manufacturing process that is to occur on-site.
- Are the training courses job training or more like continuing education or both?

The website provides information on the courses offered, but there was not any information about the educational items being produced. Is manufacturing occurring at their current location?

Regards,

Linda

Linda Ajello Hoagland, AICP  
Planner, Southeast Quadrant, Current Planning

Direct: 415-575-6823 | Fax: 415-558-6409

**San Francisco Planning** 1650 Mission Street, Suite 400  
San Francisco, CA 94103

# REUBEN & JUNIUS<sup>LLP</sup>

October 19, 2016

**BY MESSENGER**

Mr. Scott Sanchez  
Zoning Administrator  
San Francisco Planning Department  
1650 Mission Street, 4<sup>th</sup> Floor  
San Francisco, CA 94103

R# 2017-001520ZAD  
CK # 28024 \$664.-  
R. SUCRE (SE)

**Re: Request for Letter of Determination**  
**Property Address: 3030 17<sup>th</sup> Street**  
**Block/Lot: 3572/005**  
Our File No.: 10494.01

Dear Mr. Sanchez:

We are working with Harrison Metal, Inc. ("Harrison Metal"). Harrison Metal proposes to occupy the building located at 3030 17<sup>th</sup> Street ("Property"), which is currently vacant. According to the City's Property Information Report, the most recent use was light industrial. Pursuant to San Francisco Planning Code Section 307(a), we respectfully request a Letter of Determination that the proposed uses are principally permitted under Planning Code Section 210.3 and will not constitute a change of use.

**A. Property Description**

The Property is located on a 10,000 sq. ft. parcel at 17<sup>th</sup> Street between Folsom and Harrison Streets, within the PDR-1-G Zoning District. The property is improved with a 9,885 sq. ft. one story building with two mezzanines of 1,627 and 1,921 square feet.

**B. Proposed Uses**

The proposed uses are: (a) design, manufacturing, and distribution of educational materials including videos, written case studies, and books, covering subjects such as product design, general management, and United States history (with accessory clerical and administrative space for these uses well below the area allowed by the Planning Code), and (b) job training in the 1,627 sq. ft. mezzanine only. Please see the Harrison Metal website at [HarrisonMetal.com](http://HarrisonMetal.com).

Mr. Scott Sanchez  
Zoning Administrator  
San Francisco Planning Department  
October 14, 2016  
Page 2

Harrison Metal intends their uses to be limited to permitted Light Manufacturing and Job Training as defined in the Planning Code, which we understand will not constitute a change of use in the PDR-1-G Zoning District. Harrison Metal's proposal can be limited or modified if necessary to comply with the Planning Code.

**C. Conclusion**

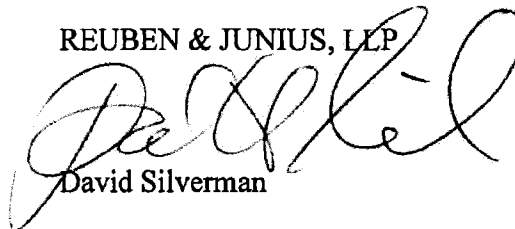
The PDR-1-G Zoning District principally permits each of the uses set forth above, which do not constitute a change of use from light industrial. (Planning Code Section 210.3).

By this letter, we request a written Letter of Determination confirming (1) that the proposed uses are principally permitted pursuant to the Planning Code; (2) that the proposed uses will not constitute a change of use from light industrial; and (3) that no mitigation fees are applicable.

I have enclosed a check for the required fee in the amount of <sup>\$664.00 - DTS</sup>~~\$644.00~~. Thank you for your assistance. Please do not hesitate to contact me if you have any questions or need additional information.

Very truly yours,

REUBEN & JUNIUS, LLP



David Silverman

Enclosures

One Bush Street, Suite 600  
San Francisco, CA 94104

tel: 415-567-9000  
fax: 415-399-9480

**REUBEN & JUNIUS, LLP**

[www.reubenlaw.com](http://www.reubenlaw.com)



**HARRISON  
METAL**

November 15, 2016

Linda Ajello Hoagland, AICP  
Planner, Southeast Quadrant, Current Planning  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Ms. Ajello Hoagland:

Thank you for reviewing my company's request for LOD on the space at 3030 17th Street, San Francisco, CA. I am writing to respond to the questions you sent to David Silverman on November 14, 2016.

Design. Manufacture. Distribution Activities

Harrison Metal designs, manufactures, and distributes educational materials such as books, printed case studies, and printed course materials for use in job training classrooms all over the world (SIC code - 2731 Books: Publishing, or Publishing & Printing). Our writers develop educational materials from research on current day and historical companies and organizations. Those educational materials are designed into physical, printed form. The designs are printed, bound, and packaged onsite. Then we distribute them to customers all over the world but primarily in the United States. Distribution is by USPS, UPS, Fedex, and local courier right from our design and manufacturing floor.

Our customers include small local businesses like Cafe Centro in SOMA and non-profit organizations such as the Boys and Girls Club and the Humane Society. We serve public, private, and philanthropic organizations of any size.

For our most successful products, we create promotional short videos that help spread the ideas and educational materials (see [www.harrisonmetal.com](http://www.harrisonmetal.com)). This activity is covered under SIC code 2741 - Miscellaneous Publishing & Printing. These videos are designed and manufactured by the same team in the same facility that produces the printed educational materials. The videos are also distributed by Harrison Metal.

Courses

Most of our readers are up and coming general managers in their organizations. In order to provide job training opportunities for a small number of them, we offer a three-day course in

general management. The course also provides a testing ground for our educational materials (books, printed case studies, and printed course materials) covering topics such as those shown in our videos. The students come from the larger audience of readers who have seen or heard about our published work. We hold one session of this course per month. Each session has between 20-40 students. Additional job training sessions will occur in small groups of five to ten students in the upstairs portion of the space. These are focused on topics of mutual interest and are usually deep-dives on areas of the general management course materials we manufacture and distribute.

Current and future courses / job training are open to any member of the public who requests them. I have never turned anyone down.

#### Light Manufacturing vs. Multi-media / Office

Our work in the space falls entirely under the permitted use for the space (Light Manufacturing). Our production and distribution of printed educational materials falls under SIC code 2731 - Books: Books: Publishing, or Publishing and Printing. Our design and manufacturing of educational materials falls under SIC code 2741 - Miscellaneous Publishing & Printing. Job training is a small portion of what we do in the space and, while it isn't Light Manufacturing, it is permitted under PDR-1-G zoning.

We do not perform any "Office" work per 890.70. The only office use in the space will be accessory to SIC 2731, SIC 2741, and job training uses. Accessory-office use will comprise a small percentage of the space as indicated in our original request for determination.

I have attached the references and sources we consulted in preparing this letter. Thank you very much for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "M Dearing". The signature is stylized with a large, looped "D" and a long horizontal stroke at the end.

Michael Dearing  
Founder

Copy

Reuben, Junius & Rose, Attn: David Silverman

## APPENDIX

Letter to Linda Ajello Hoagland dated November 14, 2016

### PLANNING CODE LAND USE DEFINITIONS

[http://sf-planning.org/sites/default/files/FileCenter/Documents/8194-Definitions%20Reference%207\\_9\\_10.pdf](http://sf-planning.org/sites/default/files/FileCenter/Documents/8194-Definitions%20Reference%207_9_10.pdf)

SEC. 790.54. LIGHT MANUFACTURING, WHOLESALE SALES. A commercial use, including light manufacturing or wholesale sales, as defined in Subsections (a) and (b) below. (a) Light Manufacturing. A nonretail use which provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers or wholesalers for resale off the premises, primarily involving the assembly, packaging, repairing, or processing of previously prepared materials, when conducted in an enclosed building having no openings other than fixed windows or exits required by law located within 50 feet of any R District. Light manufacturing uses include production and custom activities, usually involving individual or special design, or handiwork, such as the following fabrication or production activities defined by the Standard Industrial Classification Code Manual as light manufacturing uses: PLANNING CODE LAND USE DEFINITIONS 10 (1) Food processing, not including mechanized assembly line production of canned or bottled goods; (2) Apparel and other garment products; (3) Furniture and fixtures; (4) Printing and publishing of books or newspapers; (5) Leather products; (6) Pottery; (7) Glass blowing; (8) Measuring, analyzing, and controlling instruments; photographic, medical and optical goods; watches and clocks. It shall not involve the chemical processing of materials or the use of any machine that has more than five horsepower capacity, nor shall the mechanical equipment required for the use, together with related floor space used primarily by the operators of such equipment, in aggregate occupy more than 1/4 of the total gross floor area of the use. It shall be distinct and separate from a trade shop, as defined in Section 790.124 of this Code. It shall not include other general or heavy manufacturing uses, not described in this Subsection (a). (b) Wholesale Sales. A nonretail use which exclusively provides goods or commodities for resale or business use, including accessory storage. It shall not include a nonaccessory storage warehouse.

SEC. 890.54. LIGHT MANUFACTURING, WHOLESALE SALES, STORAGE. A commercial use, including light manufacturing, wholesale sales, and storage, as defined in Subsections (a), (b), (c), and (d) below. (a) Light Manufacturing. A nonretail use which provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers or wholesalers for resale off the premises, primarily involving the assembly, packaging, repairing, or processing of previously prepared materials, when conducted in an enclosed building having no openings other than fixed windows or exits required by law located within 50 feet of any R District. Light manufacturing uses include production and custom activities usually involving individual or special design, or handiwork, such as the following fabrication or production activities defined by the Standard Industrial Classification Code Manual as light manufacturing uses: (1) Food processing, not including mechanized assembly line production of canned or bottled goods; (2) Apparel and other garment products; (3) Furniture and fixtures; (4) Printing and publishing of books or newspaper; (5) Leather products; (6) Pottery; (7) Glass blowing; (8) Measuring, analyzing, and controlling instruments; photographic, medical and

optical goods; watches and clocks. It shall not include the chemical processing of materials or the use of any machine that has more than five horsepower capacity, nor shall the mechanical equipment required for the use, together with related floor space used primarily by the operators of such equipment, in aggregate occupy more than 1/4 of the total gross floor area of the use.

**PLANNING CODE LAND USE DEFINITIONS 30** It shall be not include a trade shop, as defined in Section 890.124 of this Code, or a heavy industrial use subject to Section 226(e) through (w) of this Code. It shall not include general or heavy manufacturing uses, not described in this Subsection (a).

(b) **Wholesale Sales.** A nonretail use which exclusively provides goods or commodities for resale or business use, including accessory storage. It shall not include a nonaccessory storage warehouse.

(c) **Commercial Storage.** A commercial use which stores, within an enclosed building, household goods, contractors' equipment, building materials or goods or materials used by other businesses at other locations. This use shall not include the storage of waste, salvaged materials, automobiles, inflammable or highly combustible materials, and wholesale goods or commodities.

(d) **Self-Storage.** Retail facilities for the storage of household and personal goods.

**SEC. 890.70. OFFICE USE.** (a) "Office use" shall mean space within a structure or portion thereof intended or primarily suitable for occupancy by persons or entities which perform, provide for their own benefit, or provide to others at that location services including, but not limited to, the following: Professional; banking; insurance; management; consulting; technical; sales; and design; and the non-accessory office functions of manufacturing and warehousing businesses; all uses encompassed within the definition of "office" in Section 219 of this Code (circular reference!); multimedia, software development, web design, electronic commerce, and information technology; all uses encompassed within the definition of "administrative services" in Section 890.106 of this Code; and all "professional services" as proscribed in Section 890.108 of this Code excepting only those uses which are limited to the Chinatown Mixed Use District.

(b) "Office use" shall exclude: retail uses; repair; any business characterized by the physical transfer of tangible goods to customers on the premises; wholesale shipping, receiving and storage; and design showrooms or any other space intended and primarily suitable for display of goods.

Keyword or Code   Find new customers with verified business leads

Search: Manufacturing > Printing, Publish... > Books > Books: Publishing, or Publi...

## Business List - SIC Code 2731 - Books: Publishing, or Publishing and Printing

### Reference Companies

<b>COIN Educational Products</b>	Ipewich, MA	US
<b>Thomson Reuters Corporation</b>	New York, NY	US
<b>Houghton Mifflin Harcourt Co</b>	Boston, MA	US
<b>Pearson Education Holdings Inc</b>	Saddle River, NJ	US
<b>Time Life Inc</b>	Fairfax, VA	US

Total Companies: 4,771 | Est. Employment: 155,821

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### View Complete Info on This Industry

- Related NAICS Business List
- 511130 - Book Publishers
  - 512230 - Music Publishers
  - 519130 - Internet Publishing and Broa...

### Complete Member Profiles

<b>JBE Holdings LLC</b>	Mesa, AZ	US
JBE Holdings LLC is a premier provider of mobile solutions for companies of all sizes. Founded by Justin El...		
<b>SeoTuners</b>	Agoura Hills, Los Angeles, CA	US
SeoTuners is a full service affordable SEO company specializing in SEO (search engine optimization), PPC (p...		
<b>Trekking Pole Reviews</b>	New York,	US
Ten years ago hardly anyone used trekking poles. We used to be very suspicious of trekking poles as well. J...		
<b>Youonthefloor</b>	Pune, Maharashtra	IN
Youonthefloor is an interesting new social media platform that allows users to express your inner essence a...		
<b>Techarex Networks LLC</b>	Dallas, TX	US
Our Expert Hosting Services Enable Clients Experience Better Productivity & Efficiency... Undoubtedly, opt...		

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## Description for 2731: Books: Publishing, or Publishing and Printing

Division D: Manufacturing | Major Group 27: Printing, Publishing, and Allied Industries

Industry Group 273: Books

### 2731 Books: Publishing, or Publishing and Printing

Establishments primarily engaged in publishing, or in publishing and printing, books and pamphlets. Establishments primarily engaged in printing or in printing and binding (but not publishing) books and pamphlets are classified in Industry 2732.

- Book club publishing and printing, or publishing only
- Books: publishing and printing, or publishing only
- Music books: publishing and printing, or publishing only
- Pamphlets: publishing and printing, or publishing only
- Textbooks: publishing and printing, or publishing only



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## Business List - SIC Code 2741 - Miscellaneous Publishing

**Reference Companies**

<b>Four Deuce Inc</b>	Maitland, FL	US
<b>Compuware Corporation</b>	Detroit, MI	US
<b>Discovery Communications Inc</b>	Silver Spring, MD	US
<b>Media General Comms Inc</b>	Richmond, VA	US
<b>Mentor Graphics Corporation</b>	Wilsonville, OR	US

Total Companies: 12,891 | Est. Employment: 280,930

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**Related NAICS Business List**

- 511120 - Periodical Publishers
- 511130 - Book Publishers
- 511140 - Directory and Mailing List Pu...
- 511199 - All Other Publishers
- 512230 - Music Publishers
- 519130 - Internet Publishing and Broa...

**Complete Member Profiles**

<b>JBE Holdings LLC</b>	Mesa, AZ	US
JBE Holdings LLC is a premier provider of mobile solutions for companies of all sizes. Founded by Justin El...		
<b>SeoTuners</b>	Agoura Hills, Los Angeles, CA	US
SeoTuners is a full service affordable SEO company specializing in SEO (search engine optimization), PPC (p...		
<b>Trekking Pole Reviews</b>	New York,	US
Ten years ago hardly anyone used trekking poles. We used to be very suspicious of trekking poles as well. J...		
<b>Youonthefloor</b>	Pune, Maharashtra	IN
Youonthefloor is an interesting new social media platform that allows users to express your inner essence a...		
<b>Techarex Networks LLC</b>	Dallas, TX	US
Our Expert Hosting Services Enable Clients Experience Better Productivity & Efficiency... Undoubtedly, opt...		

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### Description for 2741: Miscellaneous Publishing

Division C: Manufacturing | Major Group 27: Printing, Publishing, and Allied Industries  
Industry Group 274: Miscellaneous Publishing

**2741 Miscellaneous Publishing**  
Establishments primarily engaged in miscellaneous publishing activities, not elsewhere classified, whether or not engaged in printing. Establishments primarily engaged in offering financial, credit, or other business services, and which may publish directories as part of this service, are classified in Division I, Services.

- Atlases: publishing and printing, or publishing only
- Business service newsletters: publishing and printing, or publishing only
- Calendars: publishing and printing, or publishing only
- Catalogs: publishing and printing, or publishing only
- Directories: publishing and printing, or publishing only
- Globe covers (maps): publishing and printing, or publishing only
- Guides: publishing and printing, or publishing only
- Maps: publishing and printing, or publishing only
- Micropublishing
- Multimedia educational kits: publishing and printing, or publishing only
- Music, sheet: publishing and printing, or publishing only
- Patterns, paper, including clothing patterns: publishing and printing
- Race track programs: publishing and printing, or publishing only
- Racing forms: publishing and printing, or publishing only
- Shopping news: publishing and printing, or publishing only
- Technical manuals and papers: publishing and printing, or publishing only
- Telephone directories: publishing and printing, or publishing only
- Yearbooks: publishing and printing, or publishing only