# **Letter of Determination**

May 22, 2017

Randall Stowell Proprietor of The Archery 626 Hampshire Street San Francisco, CA 94110

Record Number:

2016-015761ZAD

**Site Address:** 

470 and 498 Alabama Street

Assessor's Block/Lot:

3968/004 and 003

Zoning District:

Production Distribution and Repair - PDR-1-G

**Staff Contact:** 

Laura Lynch, (415) 575 – 9045 or <u>laura.lynch@sfgov.org</u>

Dear Mr. Stowell:

This letter is in response to your request for a Letter of Determination regarding the business operations and land use classification of the business known as "The Archery." As noted in the application, The Archery is described as "a San Francisco-based in-residence program giving people an everyday space to work surrounded by a community of creative minds and specialized production tools." The request is to confirm the core business and operations of The Archery as a principally permitted use within the PDR-1-G (Production, Distribution, and Repair) Zoning District, and to confirm how accessory office and retail uses are permitted within the PDR-1-G Zoning District. Currently, the subject business is operating out of both 470 and 498 Alabama Street, two industrial warehouse buildings, on two separate block and lots, with an interior connection.

#### **Background**

As noted in your letter, The Archery is described as including the following uses:

- 1. **Production** (13,750 square feet.) The Archery is in the process of building 12 large studios, 20 dedicated production desks, a photography studio, a wood shop, a 3D printing and laser cutting shop, and 2 shared commercial kitchens. The Archery also includes a commercial grade coffee roastery and coffee distribution center. As with tools elsewhere in the space, the intent is to share this specialized state-of-the-art roasting equipment among multiple roasters, including start-up coffee ventures.
- 2. **Retail** (1,850 square feet). The Archery is looking to provide direct-to-the-public sale opportunities for its members and plans to curate a selection of products made both on and off-site in a distinct retail space. As a component of this gallery-style shop, the coffee roastery would operate a cafe counter serving coffee and cafe fare to the members at The Archery and to the general public. The combined footprint of this retail sales and coffee sales would occupy an 1,850 square foot area at of 470 Alabama Street.

1650 Mission St. Suite 400 San Francisco, CA 94103-2479

Reception: 415.558.6378

Fax:

415.558.6409

Planning Information: 415.558.6377

- 3. Accessory Office (4,500 square feet). Members of The Archery are often the operators of small businesses and require the benefit of an auxiliary office space. Separate from the production space at 498 Alabama Street, The Archery provides ample dedicated office space for, client meetings, and business-related needs.
- 4. Events. The Archery is seeking to host occasional events outside of day-to-day operations as an accessory use of the space.

On January 09, 2017, Department staff conducted a site inspection to assess the current operations of The Archery. Based upon the existing operations of the 470 Alabama Street space, much of the current business appears to function as "General Office" (as defined in Planning Code Section 102). However, the space at 498 Alabama Street also functions as Light Manufacturing, Arts Activities, and Catering uses (as defined in Planning Code Section 102) for various businesses to rent space and use tools on-site to produce various products.

#### **Accessory Office Use**

In determining The Archery's compliance with the PDR-1-G Zoning District, The Archery would need to demonstrate that their office use is accessory to the principal use (as defined by Planning Code Section 204.3).

Per Planning Code Section 204:

"Subject to the limitations set forth in this Code, and especially as specified in Sections 204.1 through 204.5, a related minor use that is either (a) necessary to the operation or enjoyment of a lawful principal use or conditional use; or (b) appropriate, incidental, and subordinate to any such use. In PDR Districts, accessory uses to non-Office uses (as defined in Section 102) may occupy space that is non-contiguous or on a different story as the principal use so long as the accessory use is located in the same building as the principal use and complies with all other restrictions applicable to such accessory uses."

Per Planning Code Section 204.3(d):

"No use shall be permitted as an accessory use to a lawful principal or conditional use in any PDR District which involves or requires the use of more than one-third (1/3) of the total floor area occupied by such use and the principal or conditional use to which it is accessory, except in the case of accessory off-street parking and loading."

Therefore, accessory or incidental office use within the PDR-1-G Zoning Districts would be limited to one-third of the total floor area of a subject property. Although there is an internal connection between the two buildings, 470 Alabama Street is acting under a separate business model where the office and retail use appear to be the principal uses. If the tenants using the office portion at 470 Alabama Street are limited to those who have active production space within 498 Alabama Street, then this may be considered compliant with the accessory office limitations of Planning Code Section 204.3.

In a supplemental email dated February 13, 2017, Mr. Stowell posed a question regarding if non-PDR businesses providing services to customers of The Archery would be a permissible use. These businesses would include accounting, law, and consulting. The businesses described would be considered a Professional Service<sup>1</sup> use, which is not permitted within the PDR-1-G Zoning District. The individual Professional Service businesses, although providing services to compliant businesses, would not be accessory or necessary to the operation or enjoyment of the principal use, and could not be considered an accessory office use pursuant to Planning Code Section 204.3.

#### Retail Uses in the PDR-1-G Zoning District

If the retail space provided at The Archery is accessory to the Light Manufacturing and Catering uses at 498 Alabama Street, then this would fall within the accessory use requirements pursuant to Planning Code Section 204.3 (listed above).

If the retail space provides general retail not associated with the goods produced on-site, then the retail use would be considered a principal use, which would be limited to 2,500 square feet (for the entire lot) and subject to any applicable impact fees.

#### **Event Space in PDR-1-G Zoning District**

Pursuant to Planning Code Section 210.3, Entertainment and Recreation Uses are principally permitted within the PDR-1-G Zoning District as a principal use. Additionally, pursuant to Planning Code Section 205.3, a temporary use may also be authorized in PDR Districts for a period not to exceed 24 hours per event, once a month, for up to 12 events per year per premises for any of the following uses:

- (a) A performance, exhibition, dance celebration or festival requiring a liquor license, entertainment police permit and/or other City permit when sponsored by an organized group of residents and/or business operators in the neighborhood; or
- (b) A performance, dance or party requiring a liquor license, entertainment and/or other City permit, an art exhibit, or other similar exhibition in each case if sponsored by a residential or commercial tenant or group of tenants or owner-occupants of the property or structure in which the temporary use is authorized.

A Temporary Use Authorization application<sup>2</sup> would be necessary in order to host the events listed in the application provided by Mr. Stowell. These events would be limited to one event per month. Please note that the property would also need to obtain appropriate permits from other City Agencies such as the Fire Department and Entertainment Commission.

<sup>&</sup>lt;sup>1</sup> Service, Non-Retail Professional. A Non-Retail Sales and Service Office Use that provides professional services to other businesses including, but not limited to, accounting, legal, consulting, insurance, real estate brokerage, advertising agencies, public relations agencies, computer and data processing services, employment agencies, management consultants and other similar consultants, telephone message services, and travel services. This use may also provide services to the general public but is not required to. This use shall not include research services of an industrial or scientific nature in a commercial or medical laboratory, other than routine medical testing and analysis by a health-care professional or hospital. (Planning Code Section 102)

<sup>2</sup> http://sf-planning.org/sites/default/files/FileCenter/Documents/8369-Temporary%20Use%20Application%200415%20fillable.pdf

Additionally, the property is eligible to operate multiple uses at the property. Therefore, if the property is intended to host more than one event per month, a change of use to Entertainment and Recreation Use, along with the applicable impact fees is required.

#### **Catering Use:**

The shared commercial kitchens that are located at both 470 and 498 Alabama street would be considered a Catering<sup>3</sup> use, which is a principally permitted within the PDR-1-G Zoning District.

#### **Arts Activity Uses:**

Mr. Stowell presented questions regarding the types of businesses that would qualify for Arts Activities Use (as defined under Planning Code Section 102). Specifically, Mr. Stowell presented questions regarding artists that primarily use the computer for their work such as photographers and graphic designers. With regards to The Archery, if the actual Arts Activity use is occurring on-site (i.e. use of the photography studio, printing of posters, cards, use of letterpress, etc.) then this could be considered an Arts Activity use. However, if the space is only used for businesses more aligned with an Office use (graphic design, marketing, etc.) this would be considered a General Office use, which is not permitted in the PDR-1-G Zoning District.

#### **Uses Over Time:**

Mr. Stowell stated that many companies that inquire about The Archery are described as "start-up" businesses. These businesses are intended to eventually produce a physical product. However, this may take 6-9 months to come to fruition. The uses within the PDR-1-G Zoning District must be dedicated to an active Light Manufacturing, Catering, or Arts Activity business. Similar businesses that do not currently operate as a permitted use would be considered to be an Office use and would not be permitted in the PDR-1-G Zoning District.

#### The Archery as a Principally Permitted Use in the PDR Zoning Districts

The plans accompanying the request (attached) demonstrate that the primary function of 498 Alabama Street is dedicated to a Catering, Light Manufacturing, and Arts Activity uses. The Archery website describes it as a studio space for "artists and makers" that includes a shared tool space, work benches, and locker/storage. These uses appear to be in compliance with the PDR-1-G Zoning District. A Building Permit from the Department of Building Inspection would be required to establish these uses at 498 Alabama Street.

The plans provided for 470 Alabama Street show the space being used as an accessory office space along with retail, shared commercial kitchen, and a photography studio. It is understood that the 470 Alabama Street space would be rented by individuals and businesses. After further communication with Mr. Stowell, the office space requirements have expanded to be specifically dedicated to "artists and makers." Much of the current operation at the 470 Alabama Street space appears to function as a General Office use, as evidenced by the site visit to the location. However, the Department recognizes that the project

SAN FRANCISCO
PLANNING DEPARTMENT

<sup>&</sup>lt;sup>3</sup> Catering. A Non-Retail Sales and Service Use that involves the preparation and delivery of goods including the following items: food, beverages; balloons, flowers, plants, party decorations and favors; or cigarettes/candy. (Planning Code Section 102)

includes space at 498 Alabama Street for Light Manufacturing, Catering, and Arts Activities, uses which are principally permitted uses within the PDR-1-G Zoning District. If the office space at 470 Alabama Street is limited only to tenants with active workshop space at 498 Alabama Street, then it may be viewed as an accessory use that is "necessary to the operation or enjoyment" of the Light Manufacturing, Arts Activities, and Catering Kitchen uses at 498 Alabama Street (assuming the space complies with all accessory use requirements and does not exceed one third of the floor area).

Please note that a Letter of Determination is a determination regarding the classification of uses and interpretation and applicability of the provisions of the Planning Code. This Letter of Determination is not a permit to commence any work or change occupancy. Permits from appropriate Departments must be secured before work is started or occupancy is changed.

**APPEAL**: If you believe this determination represents an error in interpretation of the Planning Code or abuse in discretion by the Zoning Administrator, an appeal may be filed with the Board of Appeals within 15 days of the date of this letter. For information regarding the appeals process, please contact the Board of Appeals located at 1650 Mission Street, Room 304, San Francisco, or call (415) 575-6880.

Sincerely,

Scott F. Sanchez

Zoning Administrator

cc: F

Property Owner Neighborhood Groups

Laura Lynch, Planner

## THE ARCHERY

Wednesday November 16, 2016

Scott Sanchez, Zoning Administrator Office of the Zoning Administrator 1650 Mission Street, Ste 400 San Francisco, CA 94103 R# 2016-015761ZAD CK# 1018 \$ 664.-R. SUCRE (SE)

Do.

**Request for Letter of Determination** 

470 & 498 Alabama St.

The Archery-Randall Stowell

Dear Mr. Sanchez,

I am the sole owner of The Archery, (www.thearcherysf.com) a workshop space at 470 & 498 Alabama St., two connected addresses shared within a single larger industrial building in the Eastern Mission. The Archery has leased this space in order to support a wide variety of local artisans and small businesses with access to shared tools, resources, and community-building opportunities.

(3968/004)

Originally built as warehousing for the Pacific Telegraph and Telephone Company, Permit history at 470 & 498 Alabama shows these buildings as having hosted many program uses over the years including manufacturing, distribution, product development, assembly and even an art gallery. The scale of the building and the open plan here have proven important ingredients to the flexibility of its use – a strong factor in my own interest in the space. Since assuming the lease here in January I have put significant effort and dollars towards infrastructure improvements. As we move to refine the scope and scale of the project I'm seeking a Letter of Determination confirming that our intended program and uses, described below and in the attached floor plans, comply with letter and spirit of our underlying PDR-1-G zoning.

After moving in to start this new business here, I became aware that the address had been spotlighted by the SF Planning Department for earlier compliance issues (since abated). In May of this year, the SF Planning Department received a complaint conveying the perception that the space was being used in the capacity of office co-working, and Laura Lynch of your staff conducted a site visit. Proceeding from that meeting I engaged Larry Badiner of Badiner Urban Planning, Inc. to advise me and I have refined The Archery concept in response to Ms. Lynch's concerns and Mr. Badiner's comments. What follows is a reflection of our current operations and direction.

#### Intended Program:

"The Archery" is organized around the main idea of providing qualified, local artists and "makers" with shared tools, infrastructure and a well-thought-out workplace. The Archery is an "in-residence" program giving people an everyday space to work surrounded by a community of creative minds and specialized production tools. It is designed to help its members take an idea from inception through to tangible marketable good under a single roof. By supporting the entire processes of prototyping, fabrication, testing, distribution and retailing, the Archery hopes to provide artisans and craftworkers an unusual resource – a fully-integrated production/distribution business environment. We believe this is an innovative way to help foster the growth of small companies and craft-oriented ventures in San Francisco.

- 1. Production. 13,750 sq.ft. The Archery is in the process of building out 12 large studios, 20+ dedicated production desks, a photography lab, a wood shop, a 3d printing and laser cutting "clean" shop, and 2 shared commercial kitchens. In addition to the plastic arts, The Archery supports culinary production work and is the home of a commercial grade coffee roastery and coffee distribution center. As with tools elsewhere in the space, the intent here is to share this specialized state-of-the-art roasting equipment among multiple roasters including start-up coffee ventures.
- 2. Principal Retail. 1,850 sq.ft. As mentioned above, The Archery is looking to provide direct-to-the-public sale opportunities for its residents, and plans to curate a selection of products made both on and off site in a distinct retail display space. As a component of this gallery-style shop, our coffee roastery, which operates under the name Front Cafe LLC and found a loyal following while housed at it's previous location on Mississippi Street in Potrero Hill, would like to operate a cafe counter serving coffee and cafe fare to the members at The Archery and the general public. The combined footprint of this retail sales and service operation will occupy a 1,850 sqft portion at the North East corner of 470 Alabama as shown on the Master Plan, keeping below the 2500 sq.ft. cap outlined in the Planning Code.
- 3a. Accessory Office. Members of The Archery are often the operators of small businesses and require the benefit of an auxiliary office space. Separate from the clamor of the shop and studios, The Archery provides ample dedicated office space for concentrated supporting work, client meetings and business related needs. As shown on the attached Master Plan, this floor area totals 4,500 sq.ft.
- 3b. Events. To build public visibility for our principal operations and our members' work, the Archery is seeking to host occasional events outside of day-to-day operations as an accessory use of the space. This proposed use is to be limited within the footprint our Accessory spaces as defined on the attached floor plan, and we are designing flexibility into the way we layout these areas to allow for such a diversity of programs. During reasonable off- studio hours we're interested in offering a public gathering place to members of the Archery interested in taking on the initiative to reach a wider community, gain exposure, foster growth, and support continued investment in our principal production operations.

It is our understanding that per Planning Code Section 204.3(b) an operation's Accessory usage is limited to not more than more than one-third of the total floor area occupied by such use and the principal use to which it is accessory. Our Accessory Office/Event space (4,500 gross sq.ft.) accounts for 24.7% of the total combined use (18,220 gross sq.ft.) in compliance with this guideline.

#### The Community:

Each "maker" looking to work at the Archery must first apply and demonstrate a particular craft or innovative product idea within the realms of the plastic arts, culinary arts, or hardware/consumer product space. When accepted, the qualifying maker will participate in a safety program and certification prior to accessing the shared workshops. With credentials established, members will be assigned an open studio seat, a work bench, and storage. Memberships will be for 1 month, 3 month, and 6 month renewable, increments. At full development, The Archery anticipates hosting 60+ makers.

Our aim is to foster interdisciplinary collaboration through members sharing tools, projects, meals, skills, and conversations. The Archery will organize a schedule various community building efforts, from shop demonstrations to skill share classes, to studio tours and artist talks. I will encourage members to showcase their products through open houses, events and eventually through our proposed retail shop in an effort to help connect product developers and makers to new market opportunities.

#### Current occupants and/or applicants include:

 Windy Chien (www.windychien.com). Windy, a longtime Mission resident and business owner, designs and builds objects including a product line of hanging lamps, hand-carved spoons and rings, using materials like brass, wood, rope and fiber. She was recently featured in the Chronicle: http://www.sfchronicle.com/style/article/Windy-Chien-s-latest-venture-lots-of-knots-9226248.php

- Tailormade (www.tailormadegoods.com). Tailormade is a modern tailor designing jackets, coats, shirts, and pants. Their service offering includes measuring, cutting, sewing and altering clothing in the old-world style of quality custom-made garments.
- Yvonne Mouser (www.yvonnemouser.com). Yvonne, also a Mission resident, is an artist, designer and builder engaged in furniture design for home and office, household goods, jewelry and fine art. She focuses on creating everyday objects at small-run production scale.
- Mod "Workplace of the Future" product prototyping team (www.mod.work). Mod is rethinking the workplace through creative approaches to environmental and experiential design. An ideal collaborating member to host at the Archery, the Mod product team will be designing and building furniture and workspace concepts and aims to engage with the Archery community for some of their market testing. Mod has been instrumental thus far in the interior and furniture design of our Accessory Office as well as the food program here.
- Taste Workshop (https://www.frontsf.com/taste-workshop). Taste Workshop is a food + design project partnering artists with chefs to create unique eating experiences and programs. They've been instrumentally involved in assembling our arsenal of culinary tools in our commercial kitchen and host pop up events at The Archery that examine, experiment and explore ways for people to connect with each other through the food we eat.

In closing, we are seeking a letter of determination from your office that confirms our intended uses at the Archery are in compliance with our PDR zoning at 470 and 498 Alabama Street as we acknowledge that we're pursuing an unusual combination of interlocking programs.

In line with language in Section 210.7 of the zoning code I was drawn to building The Archery in the Eastern Mission, seeing here "an important reservoir of space in San Francisco for new and evolving industry and activity types." I have lived in the neighborhood since 2000 and have a deep commitment to supporting our diverse community of local artists and creatives.

Thank you in advance for your consideration and time,

Randall Stowell - Proprietor of The Archery

www.thearcherysf.com 626 Hampshire St.

San Francisco, CA 94110





# MAKE

The Archery offers space and resources for artists and makers dedicated to their craft. Maker spaces range from work benches to semi-private spaces. With full access to the shop, and retail placement in the ground level showroom, residents can support and share their creative pursuits.

MAKERS APPLY HERE



#### **Artist and Maker Studios**

The Archery offers project bar desks, dedicated desks, workbench spaces, a shop with professional-grade tools, a street-level retail showroom for products made on-site, an artist-in-residence program and events held by and for the local maker community.

With options ranging from daily rental, to 24 hour resident access, dedicated desks start at \$650/month.

- · Work bench
- · Locker / storage
- · Kitchen access
- Shop privileges

#### The Shop

The Archery's prototyping shop is both an amenity for makers in residence and a community resource that allows visitors to rent time on professional tools and machines. The shop currently includes the following tools:

- 18" JET bandsaw
- 12" JET compound miter saw
- · JET combination belt/disc sander
- · Festool plunge cut track saw
- · 23 Gauge pneumatic finish nailer
- Singer straight stitch/zig zag industrial sewing machine
- 32" x 20" Epilog Fusion laser cutter/engraver
- 34" Vinyl cutter plotter
- · Assorted hand tools





#### **Shooting Space**

With stunning natural light and expansive, flexible space, The Archery is well suited to photo shoots – especially tabletop product shooting. The Archery offers:

- Spaces ideal for natural or controlled lighting
- Seamless
- A collection of surfaces
- A roster of professional shooters and stylists

#### The Kitchen

The Archery's commercial-grade kitchen is designed to house a rotating roster of chefs-in-residence and is available for rental to those seeking short-term use. Home of the Taste Workshop, the kitchen also makes possible a series of culinary experiences that explore our relationship to food and bring an artful lens to the act of eating.





#### **The Roaster**

In addition to our onsite café FRONT, The Archery is home to a Loring Kestrel roaster, the most ecologically friendly, precise roaster in the world. Designed to roast 20-75 lbs at a time and available for hourly booking, the Loring features touch screen and advanced profile controls so you can capture detailed roast data and replicate the process every time. The Loring also reduces energy consumption and greenhouse gasses by up to 80%. The roaster is available for toll roasting Monday-Friday, 7AM - 5PM.

LEARN MORE

# Schedule a tour.

Get in touch to learn more or apply to become a resident at The Archery.

Name *	
First Name	Last Name
Email Address *	
Subject *	
Message *	

SUBMIT



Empowering manufacturers. Creating jobs. Transforming our city.

# 470 & 498 ALABAMA STREET

Space Available: 200 sq ft and up Rental Rate: \$45/day to \$5,500/month

Rental Type: Sublease

Length of rental: 1 month minimum Neighborhood space is located in: Mission

Situated in the industrial heart of the Mission, The Archery is dedicated to retaining creative production in the city. With access to workspace, a prototyping shop, and a retail showroom, members benefit from an entire ecosystem of community resources, promotional support and opportunities to collaborate. The Archery also includes a cafe and dedicated host onsite to help members with daily tasks.

Contact: Jamie Shaw jamie@mod.work (415) 272-5264

# THE ARCHERY FL1 15,820 GROSS SQ FT

### TOTAL GROSS FLOOR AREA CALCULATIONS

470 + 498 ALABAMA COMBINED 20,070 SQFT

PRODUCTION SPACE: 13,720 SQ FT

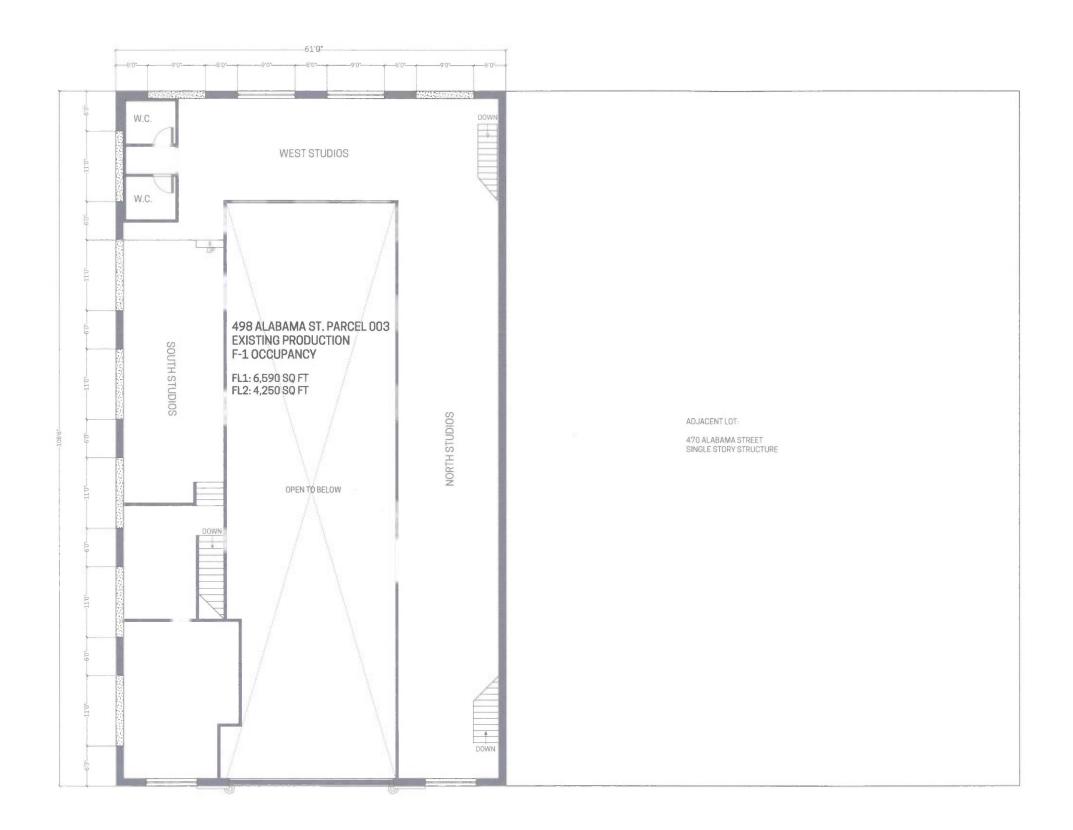
ACCESSORY OFFICE: 4,500 SQ FT

PRINCIPALLY PERMITTED RETAIL: 1,850 SQ FT



# THE ARCHERY

# FL2 4,250 GROSS SQ FT



# TOTAL GROSS FLOOR AREA CALCULATIONS 470 + 498 ALABAMA COMBINED 20,100 SQFT

PRODUCTION SPACE: 13,720 SQ FT	
ACCESSORY OFFICE: 4,500 SQ FT	
PRINCIPALLY PERMITTED RETAIL: 1,850 SQ FT	









Wholesale coffee production

Shared commercial kitchen







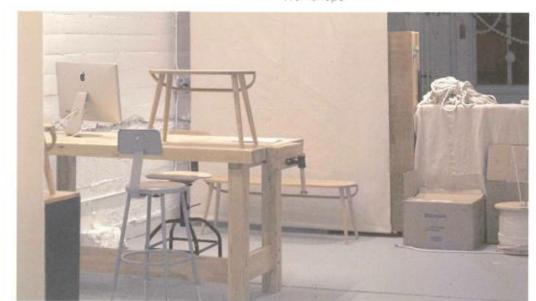
Product prototyping

Maker workshops

Workshops







Woodshop

Furniture production

Furniture maker's studio

