



City of Culver City

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Staff Report

File #: 20-800, **Version:** 1

Item #: PH-1.

PC - Consideration of an Administrative Site Plan Review and Tentative Parcel Map No. 82947 for the Construction of a Four (4) Unit Condominium Subdivision located at 4041 Sawtelle Boulevard.

Meeting Date: March 11, 2020

Contact Person/Dept: Michael Allen, Current Planning Manager;
Gabriela Silva, Associate Planner

Phone Number: (310) 253-5736 / (310) 253-5727

Fiscal Impact: Yes ☐ No ☒

General Fund: Yes ☐ No ☒

Public Hearing: ☒

Action Item: ☐

Attachments: ☒

City Council Action Required: Yes ☐ No ☒ **Date:** N/A

Public Notification: (Mailed) Property owners and occupants within a 500-foot radius and extended (02/19/2020); (Email) Master Notification List (02/21/2020), Meetings and Agendas - Planning Commission (03/06/2020); (Posted) City website (02/21/2020), Onsite Sign (02/07/2020).

Department Approval: Sol Blumenfeld, Community Development Director (03/06/2020)

RECOMMENDATION

Staff recommends that the Planning Commission 1) Adopt a Class 3 and Class 15 Categorical Exemption for this project, pursuant to California Environmental Quality Act Section 15303 New Construction or Conversion of Small Structures and Section 15315 Minor Land Divisions, and 2) Approve Administrative Site Plan Review, P2019-0146-ASPR, and Tentative Parcel Map No. 82947, P2019-0146-TPM, subject to the Conditions of Approval as stated in Resolution No. 2020-P003 (Attachment No. 1).

PROCEDURES

1. Chair calls on staff for a brief staff report and Planning Commission poses questions to staff as desired.
2. Chair opens the public hearing, providing the applicant the first opportunity to speak, followed by the general public.
3. Chair seeks a motion to close the public hearing after all testimony has been presented.
4. Planning Commission discusses the matter and arrives at its decision.

BACKGROUND

Request

On June 10, 2019, an application was submitted by Matthew D. Naering (the Applicant/the Property Owner) for an Administrative Site Plan Review (ASPR) and Tentative Parcel Map (TPM). The application request is to allow the following:

- Demolition of an existing single-family dwelling and detached accessory structure (garage),
- Subdivision of the subject site into a four (4) airspace condominiums, and
- Construction of four (4) attached residential condominium dwelling units (i.e. one (1) dwelling unit on each of the proposed airspace lots).

Zoning Code Section 17.540.015.C.3, requires the referral of a Site Plan Review application to the Planning Commission, that otherwise could be approved administratively, if another action requires Planning Commission review and approval. As a Tentative Parcel Map is submitted as part of the overall project application, both entitlements are being considered by the Planning Commission.

Project Site/Existing Conditions

The Project Site is located at 4041 Sawtelle Boulevard, on the west side of Sawtelle Boulevard, south of Washington Place and north of Washington Boulevard (see Vicinity Map, Attachment No. 2). The parcel is flat in topography and rectangular in shape, measuring 6,554 square feet. Currently, the site is improved with a one-story single-family dwelling with a detached garage at the rear, and site improvements including landscape, hardscape, and fences, with no mature trees on the site. Access to the site is provided by an approximately 8.5-foot wide driveway at the northerly edge of the site, connecting with Sawtelle Boulevard. The existing streetscape along the subject frontage consists of a four (4) foot wide sidewalk, and an eight (8) foot wide parkway including one (1) mature street tree.

The Land Use Element of the City's General Plan designates this site and surrounding properties along Sawtelle Boulevard as Medium Density Multiple Family Residential, which is consistent with the site's zoning designation of Residential Medium Density Multiple Family (RMD).

The Project Site is representative of the prevailing conditions in the surrounding neighborhood. Properties to the north, south, east, and west are also flat, rectangular in shape, and similar in size, with an average lot size of 5,656 square feet for the block.

The surrounding zoning and land uses are as listed below.

- North: Residential Medium Density Multiple Family (RMD) Zone (one- and two-story single-family dwellings)
- South: Residential Medium Density Multiple Family (RMD) Zone (one- and two-story single- and multi-family residential buildings)
- East: Residential Medium Density Multiple Family (RMD) Zone (one- and two-story single- and two-family residential buildings, across Sawtelle Boulevard)
- West: Residential Single Family (R1) Zone (one- and two-story single-family residential dwellings)

Project Description

As illustrated in the Preliminary Development Plans (Attachment No.4), the applicant proposes to demolish all

existing on-site improvements and construct four (4) condominium dwelling units with associated site improvements. The proposed condominium dwelling units have been designed as attached two-story structures, located above a subterranean parking garage. The proposed project has a maximum overall building height of 28-feet, 4-inches, to the top of the building roof, including the top of the rooftop stair projections. Each unit will have its own set of tandem parking spaces within the proposed subterranean garage, and two (2) guest parking spaces are proposed, for a total of ten (10) off-street parking spaces. The dwellings are arranged in a linear pattern oriented from the front of the parcel to the rear. The front dwelling unit will have a street-facing entry, while the remaining three (3) rear dwelling units will be accessed from side facing entries located parallel to the southerly property line. The side entries are designed to be recessed further from the main building wall. Secondary egress is provided for the three (3) rear units along the northerly side of the building/property, connecting to a small outdoor patio area, while the front unit will have secondary access and outdoor patio area along the front of the building facing Sawtelle Boulevard. The front unit totals 1,666 square feet, followed by 1,764, 1,846, and 1,809 square feet; all units will contain three (3) bedrooms and two and one half (2 ½) bathrooms. All improvements are consistent with the provisions of the Culver City Municipal Code (CCMC).

ANALYSIS/DISCUSSION:

The RMD Zone allows one (1) unit per 1,500 square feet of net lot area, up to a maximum of nine (9) dwelling units. Based on the net lot area of 6,028 square feet (6,554 gross), a maximum of four (4) units may be allowed on the site. The RMD Zone requires a minimum front yard setback of ten (10) feet or half the building height, side yard setbacks of five (5) feet, and a rear yard setback of ten (10) feet or five (5) feet when adjacent to an alley. The maximum allowable height is two (2) stories and thirty (30) feet. As shown in the Project Summary (Attachment No. 3), the proposed development conforms to all regulations of the RMD Zone.

1. ADMINISTRATIVE SITE PLAN REVIEW

Architectural Design

The structure consists of design elements from both traditional and modern styles. The proposed building incorporates both flat and sloped (hip-style) roof segments. The two-story structure will have a smooth stucco finish at various segments, including the entire second floor of the front and rear façades. Brick tile will be used at the entire ground floor of the front and rear façades and at select segments of the sides. Composite siding will also be used at select segments of the side elevations. Additional materials include metal railings and trim. Framed projecting (bay-style) windows, which are mostly narrow and tall, provide articulation; however, glass is not a predominant material throughout the building. Decorative lighting fixtures are proposed at all elevations, adding to the building's ornamentation. Rooftop decks will incorporate perimeter landscaping to further preserve privacy and enhance the appearance of the building.

The overall design and street view are further enhanced with a metal balcony railing and metal frame pop-out feature that is vertically oriented on the façade of the front unit. The main entry of the front unit is oriented to the street and, along with the various architectural elements, aids in maintaining communication with the street and contributes to the pedestrian-oriented quality of the streetscape. The building mass is articulated and broken up by the use of step-backs, and variation in the building height. The use of sloping roofs and setting back the rooftop projections reduce the massing along the street frontage. The building also utilizes varying building widths, widening on the second floor. The building is designed to be attractive on all sides, providing changes in the building materials, and variations in the building plane, adding to the multi-dimensional appearance of the building. The color palette consists primarily of white and a variety of grey-tones, from light grey to charcoal. Black accents throughout, and red at the entry doors, are also used. The color palette serves to provide depth and contrast throughout the building.

The subterranean garage is accessed from Sawtelle Boulevard through a proposed ten (10) foot wide driveway located at the northerly edge of the property. The entry is set back approximately fifty-four (54) feet from the front property line, minimizing the visual impact of the off-street parking facilities.

The project design is sensitive to, and strives to be compatible with, the residential structures in the neighborhood and the building height and massing is consistent with the zoning standards of the RMD Zone, and intent of the ASPR required findings. Materials samples for the project will be available at the meeting.

Landscaping

Landscape will include a variation in plant materials, including trees, and colors to soften the building façade and enhance the street view aesthetics of the site. There are limited opportunities for landscaping beyond the front yard, due to the need for walkways to access the various unit entries and secondary egress from the subterranean garage, the proposed driveway, and the provision of the required parking in a subterranean garage. Nevertheless, site landscaping will be maximized by providing plantings at all remaining areas, including a substantial amount of landscape along the side property lines and the westerly (rear) setback area of the site, which will have plantings similar to the front yard. The southerly setback area will be used primarily for a walkway but will have a planting strip with a mix of shrubs and screening plants to provide a visual buffer and increase privacy between the site and the southerly property. Similarly, planters with small shrubs and ground cover will be provided along the northerly setback between small outdoor patio areas and the abutting property where a single-family building is located.

The rooftop decks will also have planters with shrub planting along the deck perimeter. The planters will serve to set back the line of sight approximately 3 feet from the building edge to preserve privacy on the abutting properties. Proposed landscaping will be required to complement the building and enhance the appearance of the development. New landscaping will also include one (1) street tree on Sawtelle Boulevard, the species of which shall be in accordance with the Culver City Urban Forrest Master Plan; permanent irrigation will be required to be provided as part of the on-site irrigation. Preliminary landscape information is included in the preliminary development plans made part of this report (Attachment No. 4).

Open Space

The proposed development provides the required open space for each unit by means of private rooftop decks, which are accessed from the second-floor hallway areas. Each rooftop deck measures approximately 300 square feet, thereby meeting the minimum requirement of one hundred (100) square feet. The rooftop open space areas are bounded by the building parapet walls and railing, measuring a total of 3 feet - 6 inches in height, and are provided with landscape planters along the edges. These planters serve to preserve the privacy of the open areas and surrounding properties. Additionally, each unit has a supplementary outdoor open space area at the ground floor, measuring approximately 60 to 100 square feet (excluding landscaped areas). The open space for Unit 2 and 3 it is located at the secondary egress point along the northerly side of the building, and for Unit 1 and 4 is located at the front and rear yard respectively.

Neighborhood Compatibility

The proposed development is located along the 4000 block of Sawtelle Boulevard, which is a secondary artery developed with a variety of one-story and two-story single and multiple family residences. The block is zoned RMD, unlike the surrounding streets (Herbert Street, Albright Avenue, and Globe Avenue), and has been slowly transitioning to multiple-family development consistent with the higher density designation (Medium Density Multiple Family Residential) envisioned for the block by the City's General Plan Land Use Element.

Density

The project exceeds the average density for the block, as there are only a handful of two (2 and four (4) unit

developments at this segment of Sawtelle Boulevard and the surrounding streets are zoned R1. However, the proposed four (4) dwellings is within the allowable density formula, in compliance with the RMD Zone and corresponding General Plan designation.

Front Setback and Street Massing

The building is adequately set back to conform to, and exceed, zoning requirements. The building also incorporates architectural features and materials that break-up the massing and bulk of the development to be more compatible with development in the neighborhood. The average front setback for the sample block is twenty (20) feet, while the required setback is 14'-2", based on the RMD zone requirement of ten (10) feet or half the building height. Therefore, the proposed front setback of eighteen (18) feet, with second-floor step back up to 4.5 feet, is sensitive to the average condition on the block and exceeds the minimum code requirements. In addition, the second floor is divided into two wall segments, creating step-backs and overhangs that minimize the amount of building mass located closest to the front property line. The second floor has setbacks ranging between nineteen (19) feet and twenty-five (25) feet.

Height

While the maximum allowed building height is thirty (30) feet, the proposed roof height is 28'-4", including the stairwell projections. The roof decks are at 20'-4" with the parapets/guardrails extending to a maximum of twenty-four (24) feet. The front stairwell projection is set back a minimum of 33'-6" from the street, so as to be compatible with the average block height of seventeen (17) feet. The building's primary height will not be a stark contrast from the 16-foot high structure on the north-abutting property and the 15-foot high building to the south.

Lot Coverage

The Zoning Code does not restrict lot coverage; however, the project proposes approximately 60% overall for the site, inclusive of all cantilever and projections/overhangs. The lot coverage range for the block is 14 to 70 percent, with a block average of 30%, and approximately 63% of the lots in the block having lot coverage between twenty (20) and forty (40) percent. The proposed development aims to be consistent with the existing conditions in the sample block, while maximizing the unit floor areas consistent with the higher allowances of the Zone.

Although the overall project is a departure from the prevailing conditions in the neighborhood, the project is sensitive to the neighborhood character, and also to the goal of preserving privacy for abutting properties. Therefore, roof decks are required to have rooftop planters with landscape. The preservation of privacy is also considered by the project relative to window locations in order to minimize direct views into the abutting properties. Where windows/doors do overlap, the opening on the subject site is set back nine (9) feet and the openings on the abutting sites are four (4) to ten (10) feet from the dividing property line.

Traffic, Parking, and Circulation

The existing eighty (80) foot wide public right-of-way, Sawtelle Boulevard, has been deemed by the Engineering Division of the Public Works Department to be of adequate width to serve the site and the proposed development. Any sidewalk along the project's frontage which is not in compliance with the American's with Disabilities Act (ADA) will be removed and replaced, as will the existing driveway approach. Off-site work will also include the replanting of the existing parkway, including one (1) street tree as more specifically outlined in the recommended conditions of approval. The density of the overall development will not create any significant traffic impacts and is below the threshold requiring a traffic study or off-site improvements related to traffic.

In accordance with the Zoning Code requirements, each of the proposed units will be provided with the minimum required two (2) parking spaces, for a total of eight (8) parking stalls, which will be provided in a tandem configuration. In addition, the CCMC requires on-site guest parking for every four (4) dwellings;

therefore, one (1) guest parking stall is required, and two (2) are provided, for a total of ten (10) off-street parking stalls within a proposed subterranean garage to be shared by all four (4) units. The existing driveway located along the northerly property line will be removed and a new ten (10) foot wide common driveway will be provided at a setback of approximately two (2) feet from the northerly edge of the site, providing vehicular access to the required off-street parking for the project.

The proposed driveway slopes down into the property at 6% for the first twelve (12) feet, then 15% for eight (8) feet, then at 19%, and then transitions back to 15%, 6% and then level with the parking area. The Zoning Code indicates ramp must not exceed 20% at any point and should not exceed 3% slope for the first twenty (20) feet or another configuration may be provided as determined appropriate. The diagrams provided with the preliminary development plans demonstrate the ramp will not exceed 20% at any point and show how the alternative to the 3% slope at the first twenty (20) feet will still be appropriate for preserving safety. Four (4) diagrams showing the sightlines of two (2) vehicle types demonstrate adequate visibility of objects at both the base of the ramp and the ramp's connection with the public sidewalk, consistent with methodology used in the Federal Highway Design Manual related to speed and slope. Similarly, two (2) diagrams are provided to show sufficient undercarriage clearance will be provided at the various slope transitions.

The garage is designed to provide a minimum height clearance of ten (10) feet, allowing for additional space beyond the Zoning Code required minimum of seven (7) feet of overhead clearance; specifically, to comply with the requirements of the Environmental Programs and Operations (EPO) Division for refuse access and service. A back-up clearance of twenty-five (25) feet is provided, exceeding the minimum Code requirement of twenty-four (24) feet and allowing a sufficient turning radius and circulation area to maneuver in and out of each parking stall, and exit back onto Sawtelle Boulevard in a forward direction. Pedestrian access from the subterranean garage to the unit entry level is provided by a stairway at the rear of the building. Disabled access is provided by a wheelchair lift located at the rear of the site.

Primary pedestrian and disabled access from the public street to the entries of the units is proposed via an at-grade walkway along the southerly edge of the site, which meets the minimum four (4) foot wide access path required by the Zoning Code. The unit entries are recessed beyond the main building wall and setback, providing an 8'-10", 9'-10", or 7'-10" setback, which provides an additional buffer from the abutting property and allows a person to stand at the entry without obstructing the common walkway. This walkway continues to the rear of the site, where it connects to the stairs that provide access to the parking garage below, and is proposed to be screened from the neighboring property by a six-foot high masonry wall and landscape plantings.

The proposed means of vehicle and pedestrian ingress/egress to and from the site and units provides adequate access for emergency vehicles and services. The configuration of the proposed onsite driveway and vehicle maneuvering area are designed in accordance with all applicable CCMC standards. Based on the above, the proposed project is in conformance with all applicable CCMC requirements relating to parking, circulation, and traffic.

The project incorporates electric vehicle (EV) charging at each set of tandem stalls and at both guest parking stalls within subterranean parking garage. This exceeds the current Zoning Code requirements, which requires 10% charging stations, 10% EV ready, and 20% EV capable, plus one (1) guest charging station. In addition, five (5) bicycle parking spaces will be provided in a dedicated area within the subterranean parking garage, and will be a condition of the project if approved.

Construction Management

In order to minimize the potential for disruptions resulting from the construction related activities for the project, the applicant will be required to submit a final Construction Management Plan, Pedestrian Protection Plan, and Construction Traffic Management Plan. Per the Conditions of Approval, said plans will incorporate measures

for noise reduction and dust control, and will specify detailed construction phases and timeline, construction and crew vehicle parking, on-site staging areas, and coordination of construction deliveries.

Although the project team does not yet have a contractor for the project, the developer anticipates that sidewalk and lane closures, as well as off-site staging, will not be necessary for project construction. A temporary fencing system will be installed at the perimeter of the site to ensure construction activities and materials do not encroach into the public right-of-way or abutting properties. If the sidewalk requires repair due to damage or for ADA compliance, pedestrian access will be affected for a limited amount of time, during which the contractor will provide a protected path of travel. The contractor will assess the site conditions to determine the best method for pedestrian diversion and protection during any necessary sidewalk repair. In addition, the developer will work with the selected contractor to ensure all construction and crew vehicles are parked within the project site or at designated off-site locations with applicable City approvals.

2. TENTATIVE PARCEL MAP

The State Subdivision Map Act and CCMC Chapter 15.10 regulate the subdivision of land, and require the submittal of a tentative parcel map for subdivisions meeting certain criteria, including specific airspace subdivisions for condominium purposes. In addition, CCMC Section 17.210.020 (Table 2-4) requires a minimum lot area of 5,000 square feet or the average of residential lots within a 500-foot radius (whichever is greater) and allows condominium projects to be subdivided with smaller parcel sizes for ownership purposes, provided the overall development site complies with the minimum lot size requirements of the Zoning Code. Most of the lots in the area measure approximately 5,000 to 7,500 square feet. Parcels on this block are not uniform due to the angled configuration of the street. The subject site measures 6,554 square feet, which is within the range of most of the parcels on the west side of Sawtelle Boulevard in the segment between Washington Place and Herbert Street; therefore, the overall site complies with this requirement and there will not be any changes to the current overall lot area. One of the various objectives of the tentative parcel map process is to allow the City to review the proposed condominium subdivision to ensure all necessary improvements and requirements are provided. The Public Works Department has reviewed the tentative parcel map (Attachment No. 5) for proposed the condominium subdivision and determined it to be compliant with all applicable State and local regulations as more specifically outlined in the recommended conditions of approval.

PUBLIC OUTREACH

The first community meeting was held on Thursday, December 20, 2018 during the Preliminary Project Review (PPR) phase, and the second on Thursday, September 12, 2019, during the application review phase. The applicant sent invitations two weeks before each meeting to property owners and occupants within a 500 foot radius and extended area from the site, inviting interested persons to learn about the development project, provide comments and feedback, as well as to share any concerns regarding the proposed Project.

Community Meeting 1 - December 20, 2018, 7:00 pm (Veterans Memorial Building, 7 attendees)

Topics of discussion

- Overview of project by architect
- Density (too much) and building mass
- Parking (insufficient, and source of noise)
- Fence/wall dividing the subject site from the north property
- Privacy
- Distance of proposed building from south property
- Location of trash enclosure and potential odors

- Existing parking and traffic issues
- Issues with receipt of mailing

Community Meeting 2 - September 12, 2019, 7:00 pm (Veterans Memorial Building, 10 attendees)

Topics of discussion

- Overview of project evolution and changes made since initial community meeting
- Privacy
- Traffic and Parking (existing and future conditions)
- Density
- Emissions from new parking and traffic
- Issues with receipt of mailing

In the initial meeting, community members expressed concerns regarding potential traffic, neighborhood street parking, density, building size, and privacy, including complaints regarding existing traffic and parking conditions, and there was general opposition to the project. As a result, the applicant refined the plans with staff assistance to address community concerns of privacy and building mass. The architect also studied the possibility of reducing the number of units and proposing a three-unit project instead. However, the applicant found that with a three-unit project, subterranean parking would not be feasible, and the possible designs with surface-level parking created various circulation/maneuvering conflicts for vehicles to enter and exit the site in a forward direction. In the second meeting, community members continued to express similar questions and concerns. Although general opposition had tapered, there was still a consensus from the community that these allowable density levels are not appropriate for this corridor, primarily because of existing traffic and parking conditions.

Some of the changes and refinements that were made as a result of community consultation include the following.

- Stepping back of upper floor at front façade
- Refinement of window sizes and locations
- Incorporation of additional screening plantings

Comments Received During Public Comment Period

As of the writing of this report, staff has not received any public comments in response to the public notification of the public hearing for this item.

CONCLUSION/SUMMARY

The applicant has worked with staff to produce a project that is compatible with the neighborhood and the immediately surrounding properties and addresses the issues of importance to the Culver City residential community. Specifically, the applicant followed staff direction with regard to lowering the parking further below grade to avoid a podium condition, reducing building height, and providing additional step backs and articulation to the building. The design intends to break up the bulk and mass of the building with varying building planes and the inclusion of architectural projections and material variation to create visual relief, as well as a pedestrian-oriented façade and landscape to be in scale with the surroundings. In addition, the locations of windows and doors have been considered in order to ensure privacy with abutting properties. Based on the proposed preliminary development plans and recommended conditions of approval, staff considers the project to be compatible with the surrounding neighborhood, providing a layout, architectural design, and landscape consistent with applicable development standards and guidelines, with adequate public facilities, and consistent with the Culver City General Plan and the requirements of the Zoning Ordinance. Additionally, the Tentative Parcel Map meets all requirements of the CCMC and the State Subdivision Map Act.

Staff believes the findings for Administrative Site Plan Review, P2019-0146-ASPR, and Tentative Parcel Map No. 82947, P2019-0146-TPM, can be made as outlined in Resolution No. 2020-P003 (Attachment No. 1).

ENVIRONMENTAL DETERMINATION

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, initial review of the project by staff established that there are no potentially significant adverse impacts on the environment and the proposed project has been determined to be a Class 3 and Class 15 Categorical Exemption as "Construction or Conversion of Small Structures" (Section 15303) and "Minor Land Division" (Section 15315) project. Specifically, as outlined herein, the project involves the construction of one multi-story structure containing four (4) attached residential dwelling units and the subdivision of the site into four (4) airspace condominiums, thereby establishing one (1) condominium residential unit on each airspace lot. The proposed project involves the construction of a limited number of small structures, such as a duplex or similar residential structure, totaling no more than six (6) dwelling units within an urbanized area. The project is deemed to be consistent with the applicable General Plan and RMD zoning designation and regulations without any variances or exceptions, does not involve a parcel from a larger subdivision within the previous two (2) years, and will not result in a parcel with an average slope greater than 20 percent. In addition, the project will be adequately served by all required utilities and public services; and will have all services and access to local standards. Therefore, the project is categorically exempt pursuant to the above noted CEQA sections.

ALTERNATIVE OPTIONS:

The following alternative actions may be considered by the Planning Commission:

1. Approve the proposed project with the recommended conditions of approval if the applications are deemed to meet the required findings.
2. Approve the proposed project with additional and/or different conditions of approval, if deemed necessary to meet the required findings and mitigate any new project impacts identified at the meeting.
3. Disapprove the proposed project if the applications do not meet the required findings.

ATTACHMENTS:

1. Draft Resolution No. 2020-P003 with Exhibit A: Conditions of Approval
2. Vicinity Map
3. Project Summary
4. Preliminary Development Plans dated February 4, 2020
5. Tentative Parcel Map No. 82947
6. Community Meeting Summaries

MOTION

That the Planning Commission:

1. Adopt a Class 3 and Class 15 Categorical Exemption for this project, pursuant to CEQA Section 15303 - New Construction or Conversion of Small Structures and Section 15315 - Minor Land Division, finding there are no potentially significant adverse impacts on the environment, and

2. Approve Administrative Site Plan Review, P2019-0146-ASPR, and Tentative Parcel Map No. 82947, P2019-0146-TPM, subject to the Conditions of Approval as stated in Resolution No. 2020-P003