

# **City of Sunnyvale**

# **Meeting Minutes - Draft Planning Commission**

Monday, July 10, 2017

6:00 PM

Council Chambers and West Conference Room, City Hall, 456 W. Olive Ave., Sunnyvale, CA 94086

Special Meeting- Study Session 6 PM | Special Meeting- Public Hearing 7 PM

#### **6 P.M. STUDY SESSION**

Call to Order in the West Conference Room

Roll Call

**Study Session** 

**A**. 17-0677 **F** 

File #: 2017-7261

Locations: Citywide

**Project Description:** Accessory Dwelling Unit Study **Project Planner:** Shila Behzadiaria, (408) 730-7456,

sbehzadiaria@sunnyvale.ca.gov

**Public Comment on Study Session Agenda Items** 

**Adjourn Study Session** 

## **7 P.M. PLANNING COMMISSION MEETING**

#### **CALL TO ORDER**

Chair Harrison called the meeting to order at 7:02 PM in the Council Chambers.

#### **SALUTE TO THE FLAG**

Chair Harrison led the salute to the flag.

#### **ROLL CALL**

**Present:** 5 - Chair Sue Harrison

Vice Chair Ken Rheaume Commissioner Daniel Howard Commissioner Ken Olevson Commissioner David Simons **Absent:** 2 - Commissioner John Howe Commissioner Carol Weiss

Status of absence; Commissioner Weiss's absence is excused.

Status of absence; Commissioner Howe's absence is excused.

#### **ORAL COMMUNICATIONS**

Mary Brunkhorst presented images and information about story poles and computer modeling. Ms. Brunkhorst requested that these techniques be required for development proposals and stated an opinion that these techniques would help residents better understand the visual impacts of proposed projects.

Chair Harrison confirmed with Ms. Brunkhorst that her request is to require these techniques for all proposed developments. Chair Harrison confirmed with Ms. Brunkhorst that she has viewed story poles installed for a five-story development.

#### **CONSENT CALENDAR**

Commissioner Simons pulled the Planning Commission draft minutes of June 26th, 2017 from the Consent Calendar. Commissioner Simons confirmed staff's intent of the phrase "appropriate planter space" and made a word substitution on page 13.

Commissioner Simons moved and Vice Chair Rheaume seconded the motion to approve the Consent Calendar, with a minor revision made to the Planning Commission draft minutes of June 26th, 2017. The motion carried by the following vote:

Yes: 5 - Chair Harrison

Vice Chair Rheaume Commissioner Howard Commissioner Olevson Commissioner Simons

**No**: 0

**Absent:** 2 - Commissioner Howe

**Commissioner Weiss** 

**1. A** 17-0699 Approve Planning Commission Meeting Minutes of June 26, 2017

# **PUBLIC HEARINGS/GENERAL BUSINESS**

**2.** 17-0628 File #: 2017-7321

**Location**: 1220 Vienna Drive, Unit 546 (APN: 110-31-001)

**Zoning:** Residential Mobile Home (RMH)

**Proposed Project: USE PERMIT** for a Large Family Child Care home (LFCCH) in a mobile home community that is not located within

300 feet of another LFCCH.

Applicant / Owner: Mozaica Preschool and Daycare (applicant) /

Plaza Del Rey Owner LLC (owner)

**Environmental Review:** A statutory exemption relieves this project from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15274 (large family day care homes).

Project Planner: Aastha Vashist, (408) 730-7458,

avashist@sunnyvale.ca.gov

Assistant Planner Aastha Vashist presented the staff report.

Chair Harrison asked staff if there is a minimum requirement for outdoor space in a Large Family Child Care Home (LFCCH). Assistant Planner Vashist stated that this requirement is regulated by the state.

Chair Harrison asked staff about the reason for the 6-foot fence. Assistant Planner Vashist stated that the outdoor space must be completely enclosed as required by the Sunnyvale Municipal Code.

Chair Harrison opened the Public Hearing.

Oksana Lukish presented images and information about the proposed project.

Chair Harrison closed the Public Hearing.

Vice Chair Rheaume asked staff about the association between the number of onsite staff and the increase in the number of children cared for in the LFCCH. Assistant Planner Vashist advised that the applicant wants to hire another employee because of this increase and noted that there is a state requirement that mandates the ratio of employees to children.

Commissioner Simons commented that this is the first application he has seen for a LFCCH within a Mobile Home Park and asked staff if there have previously been any issues in these situations. Assistant Planner Vashist advised that this is the first application staff is aware of in a mobile home park in the City.

Commissioner Howard advised that two adult caretakers are required by the state for a LFCCH.

MOTION: Commissioner Howard moved and Vice Chair Rheaume seconded the motion for Alternative 1 – Approve the Use Permit in accordance with the Findings found in Attachment 3 and Conditions of Approval in Attachment 4.

Commissioner Howard spoke to the importance of the LFCCH as utilized by his family for his young children. Commissioner Howard noted that these facilities support the community and thanked the applicant for providing this service.

Vice Chair Rheaume commented that all the application materials align with City and state policy.

The motion carried by the following vote:

Yes: 5 - Chair Harrison

Vice Chair Rheaume Commissioner Howard Commissioner Olevson Commissioner Simons

No: 0

Absent: 2 - Commissioner Howe

Commissioner Weiss

Planning Officer Miner stated this decision is final unless appealed to the City Council within 15 days or called up by the City Council within 15 days.

**3.** 17-0602 File #: 2017-7411

Location: 539 East Weddell Drive (APN: 110-14-158)

**Zoning:** PF (Public Facility)

**Proposed Project:** 

**USE PERMIT:** to allow the extension of the use of the modular classrooms in the front parking lot for two years (2017-2019

school years).

Applicant / Owner: Summit Public Schools (applicant) / Sunnyvale

International Church (owner)

**Environmental Review:** Negative Declaration (Addendum)

Project Planner: Momoko Ishijima, (408) 730-7532,

mishijima@sunnyvale.ca.gov

Associate Planner Momoko Ishijima presented the staff report.

Commissioner Olevson commented that the supporting documentation for the

proposed project is almost the same as the project's original application in 2016. Commissioner Olevson stated an understanding that the 2016 approval included the use of the modular classrooms for one year and asked staff about the justification to extend the Use Permit for an additional two years. Planning Officer Andrew Miner advised that the applicant has been evaluating new sites for a high school in Sunnyvale and that they have a property in consideration. Planning Officer Miner spoke to the potential difficulties of obtaining property in Sunnyvale for their purpose.

Commissioner Olevson confirmed with Associate Planner Ishijima that the applicant is fully compliant with the Conditions of Approval (COA) for the original Use Permit. Associate Planner Ishijima provided details about the completion of the COA and the Occupancy Permit.

Chair Harrison confirmed with Associate Planner Ishijima that no new interior renovations would be required with the requested Use Permit.

Chair Harrison opened the Public Hearing.

Clint Sholl, representing Summit Public Schools, presented information about the proposed project.

Commissioner Olevson commented that when Summit Public Schools last approached the Planning Commission they assured the Planning Commission that they would complete the COA. Commissioner Olevson stated a concern that the applicant could request another future extension for continued use of the modular classrooms and asked the applicant to provide details about their potential site for the high school. Mr. Sholl advised that they are in contract for a new high school site and that they are working with the City to obtain the necessary approvals. Mr. Sholl commented that under no circumstance will they exceed the two year extension, if granted, and advised that should they be unable to secure this site the modular classrooms will be eliminated.

Chair Harrison closed the Public Hearing.

Commissioner Howard asked staff if there was an oversight made with the one year time frame as specified with the original approval. Planning Officer Miner advised that the applicant was clear about their need to use the modular classrooms for one year and noted that staff believes the applicant had the best of intentions but that finding a site was more difficult than they anticipated.

MOTION: Vice Chair Rheaume moved and Commissioner Howard seconded the motion for Alternative 1 – Accept the Addendum to the Negative Declaration in Attachment 11, make the required Findings based on the Findings in Attachment 3 and the recommended Conditions of Approval in Attachment 4.

Vice Chair Rheaume stated that he can make the findings to extend the Use Permit for two years and noted his understanding about the difficulties of finding property in the City.

Commissioner Howard stated an opinion that the applicant made an honest oversight in regards to the amount of time required to locate a school site.

Commissioner Olevson commented that he will reluctantly be supporting the motion and stated that making a one year commitment, especially to a public body, requires completion of that commitment. Commissioner Olevson commented that his decision is based on staff's recommendation and the work they have completed and that he will support the motion.

Commissioner Simons commented that he voted against the original placement of the school but stated that he will be supporting the motion. Commissioner Simons commented on a new housing development that is closer to the freeway than this project and as a result has additional clean air requirements. Commissioner Simons stated that his concern goes beyond temporary modular units.

Chair Harrison stated that she will be supporting the motion and can make the findings. Chair Harrison stated that considering the debate for the original approval, it is impressive that no public comments or complaints have been received and that there are no public speakers present at the hearing tonight.

The motion carried by the following vote:

Yes: 5 - Chair Harrison

Vice Chair Rheaume Commissioner Howard Commissioner Olevson Commissioner Simons

**No**: 0

Absent: 2 - Commissioner Howe

**Commissioner Weiss** 

Planning Officer Miner stated this decision is final unless appealed to the City Council within 15 days or called up by the City Council within 15 days.

**4.** 17-0591 File #: 2017-7300

Location: 373 Pescadero Terrace (APN: 165-46-085)

Zoning: R-1.7/PD (Low Medium Density Residential / Planned

**Development) Zoning District** 

**Proposed Project:** 

**SPECIAL DEVELOPMENT PERMIT:** for an addition of 180 sq. ft. (40 sq. ft. on the first floor in the rear and 140 sq. ft. on the second floor within the existing building envelope) to an existing two-story, single-family residence resulting in a total floor area of 1,884 sq. ft. including a 418-sq. ft. garage, and 59.3% floor area ratio (FAR).

Applicant / Owner: Design Build & More Inc. (applicant) / Danny

Leung Et Al (owner)

**Environmental Review:** Categorical Exempt Class 1 **Project Planner:** Momoko Ishijima, (408) 730-7532,

mishijima@sunnyvale.ca.gov

Associate Planner Momoko Ishijima presented the staff report.

Chair Harrison opened the Public Hearing.

Danny Leung presented images and information about the proposed project.

Daniel Sun, representing Design Build & More Inc., presented information about the proposed project.

Commissioner Simons asked the applicant about the treatment for the covering of the kitchen extension. Mr. Sun advised that it will be a low profile sloping roof and confirmed that the roofing material will match the existing building.

Commissioner Simons confirmed architectural details with Mr. Sun.

Chair Harrison closed the Public Hearing.

Vice Chair Rheaume asked staff if the development in this area originally consisted of two bedroom homes which have since been converted to three bedroom homes. Associate Planner Ishijima stated that Attachment 8 outlines the homes in the immediate area which utilized the vaulted ceiling to add a third bedroom.

Commissioner Howard stated an understanding that there is currently a second-floor window and asked staff if there would be any privacy concerns for the

adjacent property. Associate Planner Ishijima stated that it is an existing window which looks out onto the side of the adjacent home and that presumably the applicant would install window coverings for their own privacy.

MOTION: Vice Chair Rheaume moved and Commissioner Olevson seconded the motion for Alternative 1 – Approve the Special Development Permit with the conditions in Attachment 4.

Vice Chair Rheaume stated that he will be following the staff recommendation, that the applicant has followed City policies and that the adjacent homes have higher FAR's.

Commissioner Olevson stated that he will be supporting the motion for several reasons. Commissioner Olevson stated that there is no visual impact from the street view and that the home will maintain its legal non-conforming status, with no impact on the neighborhood. Commissioner Olevson commented that the rear yard encroachment meets the zoning code.

FRIENDLY AMENDMENT: Commissioner Simons offered a friendly amendment to request that the additional roof material match the existing roof material. Vice Chair Rheaume and Commissioner Olevson accepted the friendly amendment.

FRIENDLY AMENDMENT: Commissioner Simons offered a friendly amendment to request that the second-floor side window be obscured below the height of a clerestory level. Vice Chair Rheaume asked for clarification from staff if there are privacy concerns. Associate Planner Ishijima advised that the view from that window would be the garage side of the adjacent home and that it would not be a direct second floor to second floor view due to the additional recess of the adjacent home. Vice Chair Rheaume commented on the elevation and respectfully declined the friendly amendment.

Commissioner Simons stated that he will not be supporting the project.

Commissioner Simons commented that this community was a planned development where the number of bedrooms and associated parking were planned as a whole. Commissioner Simons commented that adding square footage impacts the original parking calculation and that these types of modifications are inconsistent with the planned development concept. Commissioner Simons stated that he could potentially support the creation of a loft and removal of the vaulted ceiling but not the removal of backyard space. Commissioner Simons commented that allowing changes in this neighborhood could spur further additions that shouldn't be completed.

Chair Harrison that she will be supporting the motion and can make the findings.

The motion carried by the following vote:

Yes: 4 - Chair Harrison

Vice Chair Rheaume Commissioner Howard Commissioner Olevson

No: 1 - Commissioner Simons

**Absent:** 2 - Commissioner Howe

Commissioner Weiss

Planning Officer Miner stated this decision is final unless appealed to the City Council within 15 days or called up by the City Council within 15 days.

**5.** 17-0678 File #: 2014-7602

Location: 688 Morse Avenue (APNs: 204-16-055)

Zoning: R-3

Proposed Project: APPEAL by the applicant of the Zoning Administrator's decision to deny a TENTATIVE PARCEL MAP & USE PERMIT to subdivide one lot into two lots and build two new two-story single-family homes totaling 2,877 s.f. each (including garage).

VARIANCE to allow a shared zero-lot line side yard setback.

Applicant / Owner: Huijang Jaing (applicant) / Santa Cruz Capital LLC (owner)

**Environmental Review:** A Class 3 Categorical Exemption relieves this project from California Environmental Quality Act (CEQA). Class 3 Categorical Exemptions includes construction of new construction of up to three single family homes (CEQA Section 15303 (a)).

Project Planner: Ryan Kuchenig, (408) 730-7431,

rkuchenig@sunnyvale.ca.gov

Senior Planner Ryan Kuchenig presented the staff report.

Commissioner Howard asked staff about the minimum density requirement for R-3 (Medium Density Residential Zoning). Senior Planner Kuchenig advised that three units is the policy recommendation but that two units could be proposed and would not require a Variance.

Commissioner Olevson asked staff for details about the justification of building at 75% of the allowable density. Senior Planner Kuchenig advised that staff could support less than the policy recommendation with this specific site. Senior Planner

Kuchenig stated that there were some issues with a three-unit plan, which could have been supported if modified, but explained that the applicant instead chose to reduce the plan to two units. Senior Planner Kuchenig advised that staff cannot support the current two-unit design because of the overall massing and site layout.

Commissioner Olevson commented on the visual impact of the large garage doors and asked staff if there was any discussion about reducing the visual impact so that the home entrances would be visible from the street. Senior Planner Kuchenig clarified that staff's issue is with the visual dominance of the garage doors and advised that staff recommended that the applicant use an alternative design to mitigate the impact. Planning Officer Miner commented that based on the Single Family Home Design Techniques the garage should be less dominant and not lead the design. Planning Officer Miner stated that the applicant's design is inconsistent with the policy because the home entrances are on the side and the garages in the front.

Commissioner Simons noted his agreement with staff that leading the design with the garage is an issue and asked if there was any potential to make the front door more prominent. Senior Planner Kuchenig advised that there was discussion about a more prominent entryway and that staff's preference would have been an alternative layout with that design modification.

Commissioner Simons asked staff if there was any discussion about planting a tree in the frontage between the two garage doors to help break up the massing. Senior Planner Kuchenig stated that the existing trees will be maintained and that the current design makes it difficult to implement any large trees. Commissioner Simons confirmed with Senior Planner Kuchenig that planting a tree in between the two driveways could be explored.

Commissioner Simons commented that this project would result in a high intense change in the property's pervious area and asked staff if there was discussion about the use of pervious materials. Senior Planner Kuchenig stated that staff's goal was to reduce the amount of pavement through a layout change and that the Planning Commission could add a COA about the use of pervious materials.

Commissioner Simons commented on the lack of a logical ending for the design elements and asked if this was a concern for staff. Senior Planner Kuchenig stated that the current design evolved to have some amount of wraparound. Commissioner Simons advised that his goal is to find a logical way to extend these elements. Planning Officer Miner stated that staff was primarily focused on the larger issue of the overall design because it didn't meet City guidelines.

Commissioner Simons asked staff if there was a requirement to use opaque glass in the garage doors. Senior Planner Kuchenig advised that staff did not explore that as a requirement.

Vice Chair Rheaume asked staff if there were similar concerns for the potential loss of trees with the original three-unit design. Senior Planner Kuchenig advised that the applicant's arborist believed the trees could be saved with the original design but noted that the City's arborist believed the design threatened the long term viability of the trees. Senior Planner Kuchenig provided details about a modified three-unit plan as recommended by staff and confirmed that this modified plan mitigated the tree loss, noting the possibility of the loss of one tree. Vice Chair Rheaume reiterated the appropriate placement for a garage per the Single Family Home Design Techniques and asked staff about the garage placement with the three-unit plan. Senior Planner Kuchenig advised that the design issue with the three-unit plan was with the front elevation and not the garages.

Chair Harrison opened the Public Hearing.

Huijang Jaing presented information about the proposed project.

Richard Haro, representing Drafting and Planning, Inc., presented information about the proposed project.

Commissioner Simons asked Mr. Haro if they considered stacked parking and Mr. Haro advised that they had not considered it. Commissioner Simons advised that it becomes feasible when land is expensive.

Commissioner Simons commented that the home entrances look like side or backyard doors and asked about the use of light, color or architectural elements to indicate the significance of these entryways. Mr. Haro stated that they are open to the Planning Commission's direction.

Commissioner Simons commented that construction could impact the health of the trees and that sidewalk replacement can cut tree roots, leading to tree loss. Commissioner Simons discussed the potential for a tree in the middle of the site with Mr. Haro.

Mr. Haro presented additional information about the proposed project.

Vice Chair Rheaume asked staff to clarify if the adjacent properties are conforming.

Planning Officer Miner advised that those properties are non-conforming and were built before the current code requirements.

Vice Chair Rheaume reiterated the applicant's opinion that a driveway which extends down the side length of the property isn't a good idea but noted that the driveway must be in the front or along the side. Vice Chair Rheaume stated that the goal is to get new properties into conformance with City policies and not continue a pattern of non-conformance.

Commissioner Olevson asked the applicant if they considered a two-unit flag lot so that the streetscape wouldn't be dominated by the garage doors, even though it would require a side driveway. Commissioner Olevson stated an opinion that this would be better use of the land and more in conformance with the zoning. Mr. Haro stated that the proposed project is in conformity without a street-facing entryway and commented that based on the lot size changes to the garages would take up too much space because of required setbacks and landscaping. Mr. Haro noted that the project must be examined from a financial perspective.

Ms. Jaing presented additional information about the proposed project. Ms. Jaing returned to Commissioner Olevson's question and stated that if the square footage of the units is too small then they won't be able to make a profit.

Commissioner Howard confirmed with Ms. Jaing that they have been trying to develop this property for four years and purchased it in 2012. Ms. Jaing provided additional details about their development experience.

Commissioner Simons asked Mr. Haro if they considered a two story Eichler design to emphasize the second story. Mr. Haro stated that they did not consider this design.

Chair Harrison closed the Public Hearing.

Commissioner Howard confirmed with Planning Officer Miner that tandem parking would be a feasible option for covered parking.

Chair Harrison asked staff if they have had the opportunity to explore all possible design aspects and if the proposed project presented tonight is the best option for this lot. Planning Officer Miner stated that staff does not believe this is the best option and stated that two units back to back could utilize the lot space more effectively. Planning Officer Miner provided additional details about an alternative design. Planning Officer Miner noted that the size of the homes might change with

another design but that the applicant could also separate the homes and minimize the front massing.

Chair Harrison asked staff if the sidewalks are of concern in regards to tree health. Senior Planner Kuchenig advised that staff met with the Department of Public Works (DPW) and discussed the tree protection measures that would need to be implemented. Senior Planner Kuchenig stated that correctly designing the sidewalk and planning one driveway along the north side of the property would be the best options to ensure tree survival. Chair Harrison confirmed with Senior Planner Kuchenig that the sidewalk is not the primary issue endangering the trees because of the modified design which was reviewed by DPW.

Commissioner Howard asked for details about projects that require Variances in conjunction with staff recommendations. Planning Officer Miner explained that a request for a Variance is considered by the Zoning Administrator and conducted at a staff level hearing. Commissioner Howard confirmed with Planning Officer Miner that unless a project was denied and then appealed, the project would not be reviewed by the Planning Commission.

Commissioner Simons asked for staff's opinion in regards to the Planning Commission either supporting the project with changes, obtaining consensus for an alternative design or recommending denial. Planning Officer Miner stated that it would be clearer for the Planning Commission to deny the project and the applicant can then reapply and return to the Zoning Administrator with a new design. Planning Officer Miner advised that the Planning Commission could also continue the item with suggestions and then have it return to the Planning Commission, potentially with a study session beforehand.

MOTION: Commissioner Olevson moved and Commissioner Simons seconded the motion for Alternative 1 – Find that the action is exempt from CEQA pursuant to CEQA Guidelines 15303, deny the appeal and deny the Use Permit, Parcel Map and Variance.

Commissioner Olevson stated his agreement with staff that the proposed project don't fit the zoning for the area and noted that the presence of adjacent non-conforming properties doesn't override City Council policy. Commissioner Olevson commented that most of the applicant's justification was regarding finances and the length of time, neither of which are considerations for land planning. Commissioner Olevson stated an appreciation of the fiscal and time investments made by the applicant, but noted that the Planning Commission is constrained by the zoning and guidelines as provided by the City Council.

Commissioner Olevson stated that he will be supporting the denial of the appeal.

Commissioner Simons stated that he will be supporting the motion and commented there are different design options for this project, based on the recommendations of the Planning Commission and staff. Commissioner Simons commented on the need for a prominent front entrance. Commissioner Simons stated that the adjacent non-conforming properties could be grandfathered in and that it isn't a basis to allow non-conformity for this project. Commissioner Simons stated that this project should meet the goals but noted that compromises are possible, such as minor setback issues, if the project meets the rest of the requirements.

Vice Chair Rheaume stated that he will be supporting the motion to deny the appeal and noted his agreement with staff that the proposed project doesn't meet City policies. Vice Chair Rheaume commented that the goal is to get the non-conforming properties into compliance. Vice Chair Rheaume stated that he cannot make the findings that this property is so unique that the Planning Commission should grant a Variance to allow a shared zero-lot line side yard setback. Vice Chair Rheaume commented that there should be a prominent front entrance and noted that there are other options which would improve the streetscape and potentially encourage other properties to redevelop for compliance.

Commissioner Howard commented that there are challenges for an R-3 lot considering the surrounding zoning and that is it important to respect the privacy of those neighbors. Commissioner Howard stated that he cannot make the findings to grant the Variance and noted that there are other options for the applicant. Commissioner Howard stated that he would be open to the idea of a Variance if necessary but that he has concerns regarding the lack of visibility of the front door, the size of the street facing garages and the project's incompatibility with the neighborhood. Commissioner Howard thanked the applicant for their efforts.

Chair Harrison stated that she will be supporting the motion. Chair Harrison commented that there are policies not being met, such as the 75% allowable density, and noted that there are some issues the applicant can't resolve, such as solar access. Chair Harrison stated that she has been persuaded by staff that there is a better solution for the applicant, property and the neighborhood. Chair Harrison commented that it's great that the applicant finds they work well with Senior Planner Kuchenig, that she appreciates the applicant's creativity and stated a belief that the applicant can find a way to make the project work.

The motion carried by the following vote:

Yes: 5 - Chair Harrison

Vice Chair Rheaume Commissioner Howard Commissioner Olevson Commissioner Simons

**No**: 0

Absent: 2 - Commissioner Howe

**Commissioner Weiss** 

Planning Officer Miner stated this decision is final unless appealed to the City Council within 15 days or called up by the City Council within 15 days.

### STANDING ITEM: CONSIDERATION OF POTENTIAL STUDY ISSUES

# **NON-AGENDA ITEMS AND COMMENTS**

#### -Commissioner Comments

#### -Staff Comments

Planning Officer Miner commented that a subcommittee is being formed for the Climate Action Plan 2.0, that a Planning Commissioner will sit on the subcommittee and that Chair Harrison has applied. Planning Officer Miner noted that this will be a future agenda item and that if any other Planning Commissioners are interested they should contact him. Planning Officer Miner stated that the Royal Ann Single Story Combining District will be heard tomorrow at the July 11th, 2017 City Council meeting.

#### **ADJOURNMENT**

Chair Harrison adjourned the meeting at 8:54 PM.