

Richmond 300: Code Refresh Advisory Council Meeting Notes

Date: July 9, 2025, 4 P.M.
Location: City Hall, 5th Floor Conference Room
900 E. Broad Street, Richmond, VA 23219
Microsoft Teams (<https://bit.ly/CodeRefreshAC>)



DEPARTMENT OF
**PLANNING AND
DEVELOPMENT
REVIEW**

Members Present: Wayne Credle (virtually), Bennie Gates, Elizabeth Greenfield, David Johannas, Preston Lloyd, Eric Mai (virtually), Charles Menges, Jennifer Mullen (virtually), Casey Overton, Maritza Pechin, Charlie Wilson

Members Absent: Philip Hart, Yanina James, Kendra Norrell, Michelle Parrish, Damian Pitt, Ellen Robertson, Brian White

CALL TO ORDER

Roll Call

Chair Greenfield called the meeting to order at 4:08 P.M. and then called the roll.

Mr. Mai appeared online and requested to participate virtually. Mr. Johannas motioned to allow his virtual participation, seconded by Mr. Menges. The motion passed. Ms. Mullen appeared online and requested to participate virtually. Mr. Wilson motioned to allow her virtual participation, seconded by Mr. Johannas. The motion passed. Rev. Dr. Credle appeared online and requested to participate virtually. Mr. Menges motioned to allow his virtual participation, seconded by Mr. Wilson. The motion passed.

Chair's Comments

Chair Greenfield thanked everyone for attending. She reminded everyone that the purpose of the Council is to advise the Planning Commission, Department of Planning and Development Review, and the consultant team on the zoning ordinance revision process. She announced that the meeting agenda had been modified to allow more time for public comment at the present meeting.

Approval of June Meeting Notes

Due to lack of a quorum, Chair Greenfield postponed the vote on the June meeting notes to a later time.

PUBLIC COMMENT

Chair Greenfield opened the floor to public comment.

Mitch Burton, a resident living in the 1600 block of West Grace Street, stated he understood the desire for density along Broad Street and was not opposed to 13-story development on the north side of Broad Street. However, he objected to 6-story developments on the south side of Broad Street, close to Grace Street homes. He felt tall buildings should not be located on the same alley where he lived, citing noise, loss of sunlight, and loss of privacy. He felt four-story height limits should be the standard near residential districts, as was initially proposed when the properties were assigned MX-4. Additionally, he questioned the MX-8 designation for the 1100 block of West Grace Street when there was not a business located on that block currently. Citing traffic safety concerns, he mentioned hazardous driving conditions currently experienced on the street (namely, drivers double-parking in the travel lane).

Chuck D'Prix, president of the Greater Fulton Civic Association and president of Innovate Fulton, spoke on behalf of Fulton neighbors who supported more density in the area. Because of the high traffic volume on Williamsburg Rd (10,000 cars daily), he stated MX-8 might be more appropriate than the MX-3 that was proposed there.

Morgan Hafer, a local bike courier and founder of the Henry Place Neighborhood Association, felt the city should focus on maintaining the parks, schools, transportation infrastructure, and other assets it has, instead of calling on developers to fix it all. He mentioned that various groups, including members of the skating community and also non-profit organizations like Richmond Cycling Corp, have made significant private investments in the city to enhance current assets. He provided examples of new public and private development proposals (the Mayo Island Park, Allianz Amphitheater) being implemented, felt these expensive projects competed with other city needs, and lamented that such projects cause nearby city facilities/infrastructure to remain underutilized, sit vacant or deteriorate from neglect.

Leah Jones, of the Community Climate Collaborative (C3), highlighted the importance of encouraging denser development and taller buildings along transit corridors in order to help the city achieve its climate and equity goals. She stated taller builders foster connected communities and provide more opportunities for people to work and play. She also stated that denser development helps to improve energy efficiency and lower emissions, which improves quality of life for residents and mitigates climate change.

Joh Gehlbach, of RVA YIMBY, expressed strong support for more housing choice and options in the city. They stressed this was a critical opportunity to become a more inclusive city. They were curious if the city performed an equity analysis to compare the number of homes that would be allowed in the proposed draft code versus those currently allowed under the current zoning, on a neighborhood level and income level. They also reminded everyone that public meetings are not as democratic and representative of the community as one would hope. They asked that everyone keep in mind that the voices of renters, working people, people experiencing housing insecurity, younger residents, and people who cannot afford to live in the city are often missing.

Copeland Casati, a resident living on West Grace Street, described her area as a vibrant community of renters, affordable housing, group homes, and homeowners. With Grace Street located along the Pulse transit line, she reminded the Council that it made a commitment to only upzone one-stop. For properties south of Broad Street, she stated that she and her neighbors wanted vibrant density, but that it must not block existing communities' resources. They want the city to uphold its commitments to SolSmart and to community health. She reminded everyone that shadows increase as building density and height increase, which diminishes adjacent neighborhoods' access to sunlight. With her career background in passive solar and energy efficient design, she explained that studies are uncovering trends in how lack of sunlight is hampering energy efficiency and negatively impacting personal health.

Andrew Bryant, co-lead of RVA YIMBY and 7th District resident, supported density and expanded housing options. He praised the city's ability to adapt and change in recent years in order to welcome newcomers. He felt it was short-sighted, counter-productive and unacceptable to stop newcomers from relocating to the city and felt it was the city's chance to ensure a more inclusive future with greater housing diversity. He supported duplexes and raising density in all areas of the city. As a Shockoe Bottom resident, he supported the proposed MX-6 mapping for the neighborhood.

Sarah Weisiger, a Museum District resident, believed the draft zoning map did not go far enough to increase density in the 1st District. She explained that the node at Devil's Triangle has commercial uses, multifamily apartments including a 7th story building nearby, and lots of unused surface property nearby. She felt that mapping the surface parking lots for three-story residential homes did not reflect the spirit of the Richmond 300 master plan and felt that the area deserved more multifamily. She supported duplexes, triplexes and ADUs in all of the city's residential districts. As a senior and renter without a car, she looked favorable on walkable neighborhoods, and reminded Council that the decisions made will affect everyone including renters.

Melissa Savenko, a real estate agent, business owner, lifetime city resident and current resident of the Fan, felt the draft zoning map will eliminate affordable housing. She explained that the Chamberlayne corridor is mostly comprised of affordable garden-style apartments, no more than three stories in height, and located close to downtown with great transit access. She advocated for protections that preserved existing affordable housing. She feared that mapping those apartments RX-4 and MX-6 would incentivize their demolition. She also stressed that zoning should enable more homeownership, and shared the difficulties her children currently face in trying to attain a home in the city. In light of this, she recommended that existing industrial land near downtown and near transit should be mapped for residential, and opposed preserving it for industrial use.

Ted Leffler, a resident of the Fan, explained there would not be enough affordable housing without greater density and an increase in housing supply. He felt the zoning map should allow for as much housing as possible in order for the city to achieve its economic justice, equity, environmental, housing, transit justice, and fiscal goals.

William Johnson, a North Barton Heights resident, stated that densities being considered for the Code Refresh were not affordable. He believed the developers would build new apartments, set high rent prices, and then let the buildings sit empty because it is just as profitable to do so. He also felt that a lot of landlords/property owners were holding onto their properties and waiting for the zoning map to pass so they could sell to the highest-bidding developers, who would then replace affordable units with expensive ones. He wanted the Council to consider this throughout the Code Refresh process. Where his neighborhood included drug rehabilitation homes, senior housing, and low-income housing, he pondered on the loss of Section 8 housing in his neighborhood if the draft zoning code and map were passed as proposed. He urged Council to take some time to carefully consider where these new buildings should be built. He felt the densities being encouraged by the draft map would destroy the foundations of the city's neighborhoods.

Jenn Summers, of RVA YIMBY and Strong Towns RVA, is a Providence Park resident of the 6th District. She attended a Code Refresh open house and enjoyed the event. She echoed Joh Gehlbach's comments about the importance of performing an income-level equity analysis to understand where new homes are being added. She also echoed Leah Jones's comments about density's impact on emissions and climate goals. She explained that Meadowbridge Road is a major thoroughfare in her neighborhood, but the draft map did not reflect its potential to become the transportation corridor it should be. She stated that Northside is a food desert, and embraced zoning options that would bring a grocery store to that part of town. She also empathized with people who had lived in the city for their entire lives and were struggling to remain/age-in-place. Though she recognized it was hard to affect through zoning, she wanted Council to continue considering this important issue.

Samantha Kenny, of the Richmond Association of Realtors, expressed her organization's strong support of the zoning ordinance rewrite, which they felt was long overdue. They supported the pro-density provisions, which included more by-right development and reducing minimum lot sizes. They viewed changes as being essential to address the housing shortage, and recognized the Code Refresh process as a critical step towards a more sustainable and equitable Richmond.

Chris Alexander, who was born and raised in Richmond and currently lives in Manhattan, NY expressed his love for density. He owns a house in the 1st District, which he rents out. As a real estate development, finance and construction professional, he expressed fear and concerns over the lack of guardrails to protect against developers driven purely by profit. Regarding growth, he favored an incremental approach that protected well-built, historic housing stock. He asked everyone to consider the impacts to neighborhoods and homes as they eyed by investors, multi-million dollar real estate conglomerates, REITs, and private equity firms.

Danielle Smith, a Northside renter who works in housing policy and research, expressed deep concerns over affordability, gentrification, and displacement in the city. She urged the Council to think about housing through a racial and economic equity lens, to advance Richmond 300's vision. She listed housing supply, limited wage growth, and rent inflation as factors contributing to the city's unaffordability. She

thought it was unfair to allow wealthier, white neighborhoods to opt out of growth, and force communities of color and lower income residents alone to shoulder the burdens of real estate speculation and displacement. As a possible tool to combat inequity in Richmond, she shared that Louisville, KY recently passed an ordinance that requires developers seeking city subsidies to calculate their project's impact on displacement risks.

Kevin Cianfarini, a Fulton resident, overviewed the history and impacts of redlining in Richmond, highlighting the Jackson Ward and Randolph neighborhoods. He drew parallels to how these racist policies influenced the city's current land use decisions today. He also overviewed the history, racial underpinnings, and impacts of highway construction and annexation in Richmond, highlighting the Jackson Ward and Fulton neighborhoods. He asserted that the current zoning ordinance was born out of racist land use policies and felt that high-privilege neighborhoods who benefited from these systems (especially those west of I-195) should welcome more density. He declared the city must be bold in allowing for denser housing in order to provide more opportunity to disadvantaged communities.

Justin Litterst, a lifetime Richmond resident and former Museum District Association board member, stated he owned a duplex on West Grace Street. He and his neighbors have invested a great deal in their homes, resulting in lower crime and increased density. Representing property owners and tenants, he expressed concerns related to the density along West Grace Street and Broad Street. The homes on their block were mapped to MX-3, despite being currently zoned Residential R-6. He informed the Council that there are no commercial uses on their block today, and they wished to remain residential. Additionally, the properties across the alley from them facing Broad Street were mapped as MX-13. He asked that these properties be limited to lesser heights to reduce impacts on the neighborhood (including solar energy potential and property enjoyment) and better adhere to the neighborhood's design guidelines.

Sam Runner, a resident in Shockoe Bottom, supports the zoning ordinance rewrite initiative. He voiced concerns that the proposed zoning map was not living up to the aspirations of Richmond 300. He felt that densities were concentrated in historically redlined and disinvested areas. He emphasized that every neighborhood should do its part as the city collectively embarks on a shared path toward a prosperous future, full of mixed uses, abundant and varied housing stock, and plentiful public and accessible green space. It was his desire that Richmond return to its roots as a walkable, medium-density, transit-oriented, beautiful city. While recognizing the need for balance and compromise, he felt the zoning was too cautious and timid and limiting.

Willie Hilliard, who was born and raised in Richmond and is a longtime resident, expressed uncertainties about his ability to remain a resident of the city. As a housing affordability advocate, he stressed the need for more density, especially along transit lines. But he lamented that the developments are introducing significant changes in the poorest, most impacted neighborhoods, so much so that they have become unrecognizable to him. He asked Council to consider the working class communities who built this city as they go through the Code Refresh process, because working class communities are oftentimes left out and yet are the most impacted.

Seeing no other members of the public wishing to speak, Chair Greenfield closed the public comment period and thanked everyone for their comments.

COUNCIL RECAP AND MEETING INTRODUCTION

Ms. Marianne Pitts provided a recap of the previous meeting, which featured a lengthy public comment period as well as a review of Council's comments pertaining to the online draft map. At the present meeting, the consultants would review the feedback received at recent Code Refresh engagement events (panel discussion, open houses, pop-ups, and roundtables) and also introduce their approach to drafting development standards. Ms. Pitts announced that interactive versions of the draft code documents and draft map (with commenting capabilities) were recently made available for additional public review, and could be accessed through the Code Refresh website. She informed everyone that staff would share the links to these resources, and encouraged everyone to email staff if they had trouble using them.

WORKING GROUPS UPDATE

Ms. Pitts overviewed the main highlights and takeaways from the working group meetings. A total of 134 participants provided input and feedback on the Module 1 content over the course of 6 working group meetings (with the High Quality Places working group meeting twice). Discussion topics included unit configuration, commercial uses in residential districts, height limits, setbacks, transitions, building articulation, alley development, definition of “family”, provisions for special needs housing, building coverage, amenity space, road typology impacts on zoning, provisions for vehicle-oriented uses, square footage thresholds for commercial uses, and consideration for how the CG-4 district should be applied, amongst other topics. Ms. Pitts encouraged Council to review the full set of working group meeting notes. She announced that the working groups would meet again to discuss Module 2 content once it is drafted.

JUNE OPEN HOUSE FEEDBACK DISCUSSION

Ms. LaToya Thomas, of Brick & Story, recapped the Code Refresh engagement events that were held at the end of June. A total of 198 attendees signed in at the panel discussion and three open house events (between June 24-26), and a total of 686 comments were received. Other events in June included pop-ups at the Multicultural Festival, Sacred Heart Latino Festival, and Finance Fest at The Life Church, where outreach to approximately 193 people (largely Southside residents, African-American residents, and Latino and Spanish-speaking residents) was successful. Ms. Thomas expressed thanks to Ms. James for recommending The Life Church event, and directed Councilmembers to do the same for similar events happening in their communities. Brick & Story also organized a virtual roundtable with HOME of VA and an in-person roundtable with Virginia Community Voice in June. Additionally, Ms. Thomas reminded the Council of the Community Ambassadors Program and informed everyone that two Ambassador-led roundtables were organized since late May, targeting teens/Southside residents and Black realtors/developers.

Ms. Thomas provided a high-level overview of the feedback received and announced that deeper analysis would be performed over the upcoming weeks. She noted a wide range of views in support and opposition to the zoning code update and a general agreement in the need for zoning district transitions. Concerns over historic neighborhood protection, loss of green space and tree coverage, setback considerations, and mixing of uses were also noted.

Ms. Pitts added that staff was also attending civic association meeting to share information and obtain feedback, and stated she would share the list of civic association meetings attended thus far. She also encouraged Councilmembers to share information about the Code Refresh with their own civic associations and community groups.

Mr. Mai asked if there was any data collection related to demographics and income. LaToya confirmed they were collecting information regarding race, ethnicity, housing tenure (i.e. whether one owned or rented their home in the city), address, contact information, and affiliation to the city (i.e. whether one lived, worked, or went to school in the city) via sign-in sheets at each event. She confirmed that income was not being collected. A comprehensive database has been developed to track these metrics and run future analysis. She noted that the Latino Festival presented a unique instance where attendees were not comfortable signing in or providing their names due to the current political climate, but an effort was made to perform a manual headcount to estimate the number of people engaged. As the process continues, Mr. Mai requested that Council be provided with general updates about whether the engaged population is representative of the city or skewed toward certain demographics. Ms. Thomas assured Council that they would continue to focus their time and efforts on increasing engagement with underrepresented communities through pop-up events and roundtables, where it is most successful. She called on the Council’s help for attending and promoting the Code Refresh open houses, emphasizing the partnership needed to reach everyone across the entire city.

Rev. Dr. Credle thanked Ms. Thomas for her presentation's clarity. He offered to send Ms. Thomas a list of summer events that could be helpful in reaching more people. He asked Ms. Thomas if Council should be aware of any other emerging topics or trends observed at the popups and roundtables. Ms. Thomas recounted that affordability and interest in opportunities to increase density (especially amongst Southside homeowners were concerned about their ability to age-in-place, or had larger lots and wanted to supplement their income through rental opportunities). Questions about other non-zoning programs that help with affordability were also frequently encountered.

Ms. Pechin asked how long the draft map and draft code documents would be available for public comment. Ms. Pitts answered it would be open through September 10th to allow two months of engagement. Ms. Thomas also shared considerations being made to organize a webinar and "virtual office hours" events. These offerings would showcase how to use the online platform and offer assistance to those who need it. Ms. Pechin thought the two-month time period, webinar, and virtual office hours were great ideas. Ms. Pechin suggested that an email template be created for Councilmembers to use in their outreach efforts. Ms. Thomas agreed to draft a template.

Mr. Mai asked if zoning's impact on affordability was being communicated at the open house events. Mr. Rene Biberstein, of Code Studio, informed Council that they were planning to re-engage their economic consultant firm to perform some scenario testing on the draft code's impact on housing supply and affordability.

Chair Greenfield asked Ms. Thomas if any tenant organizations had been reached. While not directly reached yet, Ms. Thomas mentioned the roundtable with HOME of VA, which provided indirect insight into tenant needs by way of tenant advocates, housing service providers, and other liaisons. Chair Greenfield offered to provide a list of recommended organizations to reach out to.

CONSULTANT PRESENTATION AND DISCUSSION ON DEVELOPMENT STANDARD GOALS

Mr. Biberstein began a presentation on development standards, stating that the intent was to share a draft of the development standards at the next Council meeting. Throughout his presentation, he led Council discussion on various development standards topics, which included:

Topic: Mobility and Access

Regarding vehicle parking lot design, Mr. Johannas asked about the possibility of allowing "landscaped islands" to be consolidated into a large, useable green space. He supported reducing driveway widths, and recommended that interconnectivity between private parcels be explored.

Mr. Menges sought clarification on why a zoning code would impose maximum parking requirements if the market already dictates a certain amount of parking needed. Mr. Biberstein was clear in stating that he was not advocating for parking maximums, and instead only wished to inform Council of their use in other cities to support high-density and high-transit areas.

Regarding sidewalk access, Ms. Pechin noted there should be flexibility for dimensions of walkways, since some places might have site constraints or might not need a wide walkway. Regarding vehicle access, she supported driveway spacing requirements, and recommended that more consideration and flexibility be given to driveway entrance location and driveway width. She appreciated Mr. Johannas's idea about pooling the landscaped islands within parking lots to create a large green space.

Regarding driveway widths, Mr. Wilson stated that driveways wider than 8 feet are sometimes needed along main roads, especially in low density residential neighborhoods without alleys, for traffic safety reasons. Also, to encourage enhancements to the public realm, he suggested offering additional zoning entitlements (like extra height) to those providing public plaza spaces within their developments.

Regarding surface parking, Mr. Menges suggested standards requiring permeable materials to reduce runoff. Mr. Johannas mentioned this could relate to onsite stormwater management standards.

Rev. Dr. Credle recommended that considerations be given to multi-modal mobility, particularly in providing space for the parking of public scooters and bikes so people have a place to park them and not leave them in the walkway. Mr. Biberstein stated scooter/bike parking requirements could be imposed, and development standards for the design of scooter/bike parking areas and pedestrian connection pathways could be created.

Regarding parking maximum requirements, Mr. Mai preferred not to include them, though he could understand that they might be appropriate in some parts of the city. Chair Greenfield also opposed them, noting that developers strive only to include the amount of parking deemed absolutely necessary for their projects. Although supportive of transit and understanding of its intent, Mr. Wilson anticipated challenges over parking maximums if they were to be included and felt it was not worth the fight.

Topic: Transitions and Screening

Mr. Johannas felt rear setbacks were beneficial to reduce concerns over loss of privacy and sunlight. He also mentioned there may be a need for setbacks on front facades, and a need for overlay districts that require streetscape elements (especially for access to light and air along narrow streets). As a solar energy proponent, Mr. Gates asked if the setbacks were being proposed simply for aesthetic purposes, or to preserve solar energy potential for nearby private homes. Mr. Biberstein stated the intent was both and pondered how such solar energy protections could be quantified. Ms. Pechin explained the challenge in ensuring solar energy potential for every parcel, noting it was a complex issue that involved building heights, the sun's path in the sky, trees, and other factors.

For ease and simplicity, Ms. Pechin favored stepping solutions that did not involve inclined planes. Chair Elizabeth echoed these comments.

Mr. Wilson recognized Richmond is a hot, Southern city and noted the importance of shade in urban heat mitigation. He supported buildings that create shade, recounting a past trip to France where buildings casted enough shade to keep him cool. He also stated that a building located to the north of a property would not impact the property's access to sunlight. Mr. Johannas agreed on shade's ability to increase comfort when walking around the city.

Topic: Fences and Walls

In contrast to transitions and screening standards (which are generally encouraged by imposing minimum requirements), Mr. Biberstein explained that the fences and walls standards sought to restrict heights by imposing maximum requirements.

Ms. Pechin explained that screening utilities can be tricky, given complexity of Dominion Energy's rules.

Mr. Johannas suggested there should be limits on fence/wall lengths. He favored requirements that forced breaks/gaps in fences and walls for connectivity, permeability, and access purposes.

Topic: Landscape and Lighting

Mr. Biberstein explained that the Virginia General Assembly authorized localities to adopt minimum tree canopy requirements. Since trees are natural and vary greatly in size, shape and health, he admitted it was difficult to quantify and administer tree requirements. He informed everyone of the tree density standards that his Code Studio developed for Roswell, Georgia, which gave preference to larger trees and preserving existing trees. He also mentioned the idea of protective buffer areas around trees (or "tree save areas"), where development is restricted. He also mentioned streetscaping standards that would require private development to augment the public realm, and briefly touched on lighting standards.

Mr. Johannas advocated for street trees. He stressed the new zoning code should create standards that provide more space for them, whether this is accomplished through building setbacks or other means.

Ms. Pechin suggested that developers be given a by-right density bonus when dedicating land to the city for sidewalk access in order to offset the loss of property value caused by the dedication. She also

opposed code references to specific models and brands of lighting fixtures, as lighting design and technology is always changing. Instead, she recommended that the zoning code specify desired features and outcomes (such as dark-sky compliance).

Mr. Wilson understood the intent of tree canopy requirements. He asked for clarification on how the requirements might be enforced, asking if a homeowner would be in jeopardy of a zoning violation if they were to cut down trees in their backyard. Mr. Biberstein expanded on the challenges of enforcement and agreed to devote more time for this discussion during the next meeting after drafting potential standards.

Topic: Signs

Mr. Biberstein explained that the goal of sign regulations was to reduce visual clutter and establish standards for design and maintenance. He mentioned that the general approach would be to regulate signs generally by category (wall signs, projecting signs, monument signs, etc.).

Given the lack of time remaining in the meeting, Council wanted to reserve time to talk about signs at the next meeting.

Topic: Affordability

Mr. Biberstein explained that the goal of affordability standards was to incentivize the creation of affordability housing through bonus height/density allowances. He explained the challenges in that the Virginia General Assembly specifically authorized density bonuses, however the draft code as proposed shifts away from regulating density in favor of a more form-based framework. He explained that the City was evaluating the authority it has in developing affordability standards under this framework. If unable to incentivize affordability through bonusing, he stated they would look at other ways to achieve affordability.

Noting the ties between affordability and displacement, Mr. Wilson suggested examining supplemental regulations that discourage displacement. Mr. Biberstein reminded Council of some possible provisions already discussed, such as preservation of existing units, smaller lot sizes, the introduction of sublots, and allowing cottage courts and 'missing middle' housing.

Vice Chair Lloyd mentioned he was involved in the creation of the Virginia General Assembly authorizing legislation. He suggested that further examination of that Code of Virginia section may reveal an ability to bonus 'height' as a form of density. He also mentioned that Section 3 of that legislation allowed the city to provide relief from development standards (such as setbacks and stepbacks) that cause financial strain on the project. He recommended that the draft zoning code include a menu of potential relief options that could help improve the feasibility of a project.

Chair Greenfield requested that the conversation be continued as the first item of discussion at the next meeting.

ADJOURNMENT

With a quorum present, the Council revisited consideration of the June meeting notes. Motioned by Ms. Pechin and seconded by Mr. Wilson, the Council approved the June meeting notes.

Before adjourning, Chair Greenfield announced the next meeting is scheduled for August 14, 2025, at 4 P.M. in the 5th Floor Conference Room at City Hall (900 E. Broad St, Richmond, VA 23219). She also reminded everyone that the draft zoning map and draft code documents were available online and would remain open for public comment through September 10th.

Chair Greenfield adjourned the meeting at 6:34 P.M.