

Checklist of Potential Changes/Discussion for Town Board

YES = proceed with draft code modification

TBD = To be discussed by the town board

EC = Edits to Zoning Text Already Included in Next Zoning Version

	Reference	Topic	Board Decision Yes/No
1	Pg 40	<p><i>WEDDING RECEPTION, PARTIES, OR PRIVATE EVENT FACILITY - A commercial activity at a location where events are held, including but not limited to weddings, parties, meetings, family reunions, and corporate events. The event locations can include, but not limited to tents, gazebos, barns, open areas, and residential or commercial structures. Events for which the owner or operator of the venue receives no fee or other remuneration in connection with the event and no fees are charged to attendees shall not be considered commercial events. Similar events held by not-for-profit organizations by and for their membership shall not be considered commercial events.</i></p> <p><u>Commercial</u> Wedding Receptions, Parties and Special Events as part of Farm Operation <u>(does not include private weddings, parties, and special events)</u></p>	EC
	Use Tables Page 66:		
	Use Tables Page 66:	<u>Commercial</u> Wedding Receptions, Parties and Special Events not part of Farm Operation <u>(does not include private weddings, parties, and special events)</u>	EC
	Table 2	Review use table and other locations and add 'commercial' where needed – for example auto repair to ensure there is no confusion between private use and commercial use	TBD
2	§180-52-B	Feed lots, fenced runs, manure storage facilities, pens and facilities of similar intensity used for animal raising and care shall be set back at least 100 feet from the boundary line of any neighboring property <u>(excluding pastures, meadows, and paddocks)</u> and from any stream banks, unless the stream is located in a pasture.	EC

3	§180-52-C	<p><i>Temporary roadside stands for sale of agricultural products shall be permitted if:</i></p> <p>(1) They are set back at least 50 feet from the center of the road 20 feet back from the public right-of-way;</p> <p>(2) Parking spaces are set back at least 50 feet from the center of the road 20 feet back from the public right-of-way;</p>	EC
4	§180-41-E	<p>(1) All home occupations shall be owner occupied by a person living on the property in which the owner person must be in residence to operate the home occupation. The residence used for a home occupation shall be the domicile of the owner person operating the business.</p>	EC
5	§180-58-M	<p><i>M. Theater (1) There shall be a minimum of 10 acres.</i></p> <p>(2) No facility shall be approved for greater than 100 seats, regardless of whether indoor, outdoor or any combination thereof.</p> <p>Note: Eliminate 180-58 M. Modify 180-58 U #2 As follows: Must Encouraged to be in an existing structure.</p>	EC
6	Use Tables Page 66:	Museum, art gallery, theater or cultural facility, nature center/ecology outdoor: change from "X" to "SUP" in RL1, RL2, RL3	NO change
7	Pg 16	<p>DOMICILE - A person's fixed, permanent, and principal home for legal purposes and which is physically occupied by the owner for the purposes of living there at least 160 <u>90</u> days per calendar year. For the purposes of this definition, "Domicile" is distinct and different from "residence." As is often noted by courts and commentators, a person may have many residences, but can have only one domicile. Property used for Class 2 or 3 short-term rental use must be the domicile of the property owner.</p>	TBD
8	180-41 (F)(2) pg 22	Fix discrepancy between # employees allowed for major home occupations (should be 4 or 5, but not both) Change to 5	EC
9	180-34 (5) (q)	Remove requirement to have porches in new construction in hamlet	EC
10	180-51 pg 168	Clarify location of parking of RVs, boats, etc. 180-51. Storage of mobile homes, boats, trailers and trucks. Except as otherwise permitted under the provisions of this chapter or any other Town regulation, no mobile home, boat, trailer, travel trailer, RV <u>or tractor trailer</u> truck shall be stored	EC but more

		(which is different from parked) in the front yard in any district. <u>Such vehicles may be parked in the front yard for not longer than 30 aggregate days in a calendar year.</u> (Note: add language better defining tractor trailer truck using gross vehicle weight and how to insert screening. (see p 120 also) (SEE SUGGESTED CHANGES FOR THIS)	discussion
11	180-36	<i>Accessory Structures</i> Remove maximum of 2 accessory structures and instead allow for more provided the 30% lot coverage is not exceeded and all setbacks are met.	EC
	(D)(3) pg 132		
	(D)(1) pg 132	Remove 1 floor height restriction for accessory uses and allow to have the same height as allowed for all other uses (35') (Note - does not include farms)	EC
12	Definitions	Add definitions for: front yard, minimum yard, directly in front, glare, trademarked architecture, personal use, incidental occupation (or just incidental), significant increase in traffic	EC
13	180-49 pg 165	Review and significantly update noise section. Add a definition for "impulsive noise" and remove the definition for "quiet zone." (NOTE: There is a definition but it may need modification.)	EC
14	(C) (2) pg 120	Clarify that screening would not need to be added for parking lots in front yards when associated with pre-existing commercial uses.	EC
15	Table 2	Add Travel Trailer Storage Facility (personal use) to Use Table. It is defined but not in Use Table and tie to it being an accessory building. NEED TO KNOW WHAT DISTRICTS AND WHETHER P, SUP OR SPR IN THOSE DISTRICTS.	YES But Still TBD
16	Definition	Add space to format dwelling unit definition (Note: unsure what this means)(Simple formatting)	EC
17	180-31 C (1) pg 120	Remove requirement for 4' – 8' sidewalk in hamlet districts	EC
18	180-58 (j)	Add public/private firing range to 180-58 (j)	EC
19	180-31	180-31 C (7) clarify discrepancy between (B) and C (7) of this section – referring to whether a drive through is allowed or not. (NOTE: 180-31, 7(i) repair sentence. Change to be "In Business and Industrial zones where drive thru facilities are allowed, the shall be located at the side or rear of buildings...) THE ISSUE IS THAT (B) SAYS TRADEMARKED ARCHITECTURE IS ALLOWED IF IT MEETS THE OTHER STANDARDS AND (C) (7) SAYS THAT TRADEMARKED ARCHITECTURE	Partially EC TBD

		IS NOT ALLOWED IN ANY DISTRICT. CLARIFY (B) TO (C) (7) DISCREPANCY.	
20	180-58 (D) (6)	For Bed and Breakfast – remove the requirement that there can't be a separate dining room for paying guests.	EC
21	Table 2	Table 2 indicates that large (>700sf) accessory structures must go through site plan review. #11 above suggests we can allow for more accessory structures provided they meet setbacks and lot coverage rules. But 700sf is a large building and the principle is sound to require some review for that to make sure it meets setbacks, and other zoning requirements. Suggest that we create a flexible, expedited spr for accessory buildings of > 700sf that has lowered fee, 'may' for a public hearing at the discretion of the PB, sketch plan (not a survey), etc. so that it gives ability to ensure these are sited in a manner that doesn't cause issues, but that it is done flexibly and quicker – basically creating an abbreviated spr for these structures.	EC
22	Multiple places	Many places the law says no parking, accessory uses, or other activities in the front yard. In the hamlet this should hold true since we want to have shallow setbacks and houses moved towards the front. In the RL districts, this is less important. Suggest that we change those instances and allow parking or accessory structures in front yards provided the use/structure is set back beyond the front yard setback.	EC
23	180-36 (Page 132 C (2))	Remove word 'altered' from the discussion. And on C (1), add word 'residential' before character as the goal is to retain the residential character of the structure, not necessarily the overall character of the building. (Note: Ok with concept but re-write the sentence.)	EC
24	180-36 A (1)	Requires an accessory structure used for a dwelling to be no more than 50' from principal dwelling. Remove this as the more important principle is to not allow subdivision of an accessory apartment so keep the third sentence.	EC
25	180 - 38 (2)	Regulates the height of an amateur antennae. The questioner poses that this is not allowed by Federal FCC rules. See my answer, but this is one the attorney can look into. I note that we did NO editing on the cell tower section so a more recent ruling by the FCC may have changed what was there originally.	EC
26	180-64 pg 203	Clarify the non-conforming building destroyed values and if footprint is not changed, can be rebuilt the same. (Note from Nan – I am unclear as to what the issue is here) (Note: look at Article 6 and consider longer term (3 years instead of 1) for fire situation in this article.)	EC

27	180-41 E(4)	Concern raised over requiring screening for parked cars associated with a minor home business. Consider removing this item.	EC
28	Definition	Discuss whether owner-occupied definition needs to be changed from 183 days to 160 days to be consistent with definition for Domicile. They are used in different contexts so might not be necessary. Discuss.	TBD
29	Definition	Amend the mixed use definition to clarify that a home occupation is not considered a mixed use as those are two different uses treated differently. (Definition for MIXED-USE - both residential and commercial uses are located in the same structure. All nonresidential uses in hamlets and business district in a mixed-use structure shall front the street.)	EC
30	180-41 F (2)	Clarify that the restriction of employees or contracts are for those on site on a daily basis – not all contractors that a business might need “... shall be employed or contracted with and located on a daily basis on the residential premises in the conduct of all home occupations thereon.” To address the need for additional contractors.	EC
31	180-58 (I) (1)	Remove (1) so that activities at the group home are not required to be 75 feet from property line. Group homes are treated as single family residence and should have the same requirements.	EC
32	Table 2	Membership club- now indicates that it is allowed in all districts as an SUP only if it is an adaptive reuse of existing structure. This implies that a membership club can only be used in an existing building, and further only when that is on a state or county road. Confirm this is what the Board intended. (Change use table to SUP deleting other language across the zones and SPR in B & I)	EC
33	Definition	Membership club – change to “a group of people organized for a common purpose to pursue common goals, interests, or activities on their own property that may or may not have a structure on it, and usually characterized by certain membership qualifications, payment of fees or dues, regular meetings, and a constitution and bylaws. An outdoor firing range is a separate use and shall not be considered a membership club in this local law.” This came up with a question of whether the hunt club is a membership club. We need to know more information regarding the Hunt Club. We do know it is a long established organization. It is a unique organization. I am not sure the how to classify the hunt club. If	EC

		you feel it is, we can add a definition for hunt club and add it to the use table. Discuss. (Change use table to SUP deleting other language across the zones and SPR in B & I)	
34	180-32 Rural Siting Standards page	Consider removing: (g) Non-agricultural building exterior building walls shall not consist of plain, reinforced concrete slabs, mirrored glass, press-wood or corrugated steel.	EC
35	Design Standards	Consider changing for rural, hamlet, and commercial design standards: These standards are mandatory for all uses in those districts and are in addition to those required in other sections of this local law and the Town of Chatham Subdivision of Land Law. To: Where the word 'shall' is used in these standards, the standard is mandatory. Where the word 'should' is used in these standards, the standard is encouraged but not mandatory.	NO change
36	Ag Buffers	Consider allowing for flexibility in the 200' buffer requirement for buffers when new development is next to active farmland.	TBD
37	Page 50	Table 1 – needs formatting to line up numbers with front, side, rear categories	TBD
38	Use Table	Change footers to have the same date as rest of document	TBD
39	18029	Clarify and simplify applicability of (A) so that it is clear that this does not apply to single and two family homes except in EPO and is oriented to commercial uses.	TBD
40	EPO 1	Needs clarification of what is 'should' or 'shall'. (C) (4) consider doing away with this one as it is not needed to meet the goals. Ensure that things that are 'to maximum extent practical' are identified as such and things that are 'shall' are too so there is no confusion.	TBD
41	EPO2	(B)(1) (a) shall vs should. Remove 1 (b); simplify and combine (f) and (g). Specifically discuss if you prefer to add this level of detail to guide PB and applicants as prescriptive or simplify and allow PB to make those decisions. These are items the PB shall evaluate, but the details could be removed to leave it up to the circumstances and Planning Board.	TBD
42	Kinderhook	The H1 standards for lots, etc. don't really work in Kinderhook Lake. Long term this should	EC

	ok Lake	be its own hamlet with its own standards. For now, create exceptions for setbacks and other requirements where needed because they won't work in Kinderhook Lake. Would need to find all those places in the zoning and make an exception. Language should be to name the roads in the H1 near Kinderhook Lake.	
43	STR	Address STR and abutting properties owned by the same person. STR is allowed 1 per parcel, but if someone owns more than one parcel and they are abutting, consider allowing them to use that 1 STR on any of those properties even if they don't live in that house. To do this we would also define 'abutting' to also included parcels immediately adjacent and across the street using the same language for abutting as found on page 98 (2).	TBD
44	p. 169	Define the difference between "parked" and "storage."	TBD
45	Trash Bins	Review 180-40, p. 150 and consider adding "remove from the road shoulder" and discuss other changes.	TBD
46	p.165	Consider replacing the word "any" in this article and throughout the document.	TBD
47	Definition	Historic character - consider removing "deep rural setbacks"	TBD
48	Day Care	<p>Update Definitions and coordinate use of same terms in Use Table to allow for day care centers to be minor or major home occupations, and commercial day care center (not as a home occupation as full business operation:</p> <ul style="list-style-type: none"> • Child Day Care Center - Remove "Child" so this is a day care facility in a residence for more than 6 people • Family Day Care Home – Remove “Home” so it is Family Day Care – to refer to a day care facility in a residence with 6 or fewer people • Add definition for Commercial Day Care Center as a day care facility that is not in a residence and for more than 6 people. • Keep the P/SUP, same as now for each. <p>Minor Home Occupation - Replace "in-home day care" with "Family Day Care" and change "5" to "6"</p> <p>Major Home Occupation – Replace in-home day care operation with “day care center” and change “5” to “6”</p> <p>Use Table – make terms consistent:</p>	TBD

		<ul style="list-style-type: none"> • Use Day Care Center, Family Day Care, and Commercial Day Care Center • Discuss whether to remove the County/State Road requirement (# of trips/day increase impact) <p>180-58 (F) - Change title to read, "Day Care Center"</p>	
49	Definition	Comprehensive Plan - consider adding length of time for review/update to the definition	TBD
50	Acc. Building Comm.	Use table: Consider changing the 50% to something greater (possible 125%) to compensate for a small primary residence.	TBD
51	Day Camp	Use Table - discuss State and County road restriction. Remove?	TBD
52	Def	Add a definition for pervious surface (A surface that allows the percolation of water to the underlying soil)	TBD
53	180-32	Rural citing standards, C,4, d) change "concrete" to "permeable" to read (permeable pavers or crushed stone, for example)	TBD
54	180-29 C (1)	Planning Board wants to have site visit after their first meeting and 30 days is not enough time to do that. Change setting the site visit from 30 days after receipt of an application to after 30 days from sketch plan meeting.	TBD
55	180-29 C. (2)(e)	Planning Board feels 45 days is not enough time to ensure a decision could be made and that 45 days means an extra meeting would have to be held to meet that requirement. Consider changing rule that a decision has to be made within 45 days after deeming the application complete to either 62 days (like regular site plan) or language that gives flexibility such as "a decision has to be made as soon as possible but within 62 days" to convey sooner is better.	TBD
56	CAP Def	Delete the last sentence for Agri-Tourism: AGRI-TOURISM - Activities conducted on a farm operation as defined by New York State Agriculture and Markets Law, and offered to the public, or to invited groups, for the sale of agricultural products, education, recreation or active involvement in the farm operation. An agri-tourism activity must be	TBD

		secondary to the primary farm use on a property. Agri-tourism activities may be conducted in an accessory building or structure. Agri-tourism activities may include but are not limited to on-farm Bed and Breakfasts, farm stay programs, u-pick operations, maple sugaring, and pumpkin patches. The New York State Department of Agriculture and Markets determines on a case by case basis if such an activity is part of a farm operation.	
57	CAP 180-58, Y p.183	<p>Modify as follows:</p> <p>1) The Planning Board shall may consult with the New York State Department of Agriculture and Markets on a case-by case basis to determine whether the Department considers a specific proposal to be eligible as part of a farm operation under AML 305-a. In cases where the farm operation offers a recreational activity or holds a special event, including charitable events as part of its overall marketing strategy, the event is open to the general public, the farm's agricultural products/services are sold at the event and no admission, facility rental and/or vendors fees are involved, these activities are part of the farm operation and the NYS Department of Agriculture and Markets review shall not be necessary. The primary purpose of the events must still be to market the farm's agricultural commodities and the events must be sufficiently related to the farm operation.</p> <p>2) Agritourism activities determined to be part of a farm operation shall be subordinate to the farm operation. On-farm special events and activities may be determined to help market the farm operations' crops, livestock and livestock products. Agri-tourism events and activities must be: 1) directly related to the sale and promotion of the crops (including beverages), livestock and livestock products produced at the farm; 2) incidental and subordinate to the retail sale of the farm's crops, livestock or livestock products; 3) hosted by the farm; and 4) feature the farm's crops, livestock and livestock products. The primary purpose of an agri-tourism event/activity is to sell the farm's agricultural commodities. and not to gain admission fees or other income.</p> <p>3) All agritourism uses, with an expected attendance above 300 people/day, shall require a modified site plan approval as per 180-29 (C) (2).</p>	TBD
58	CAP 180-29, C (2)(a) p.102	<p>Modify as follows:</p> <p>a) Applicability:</p> <p>1. Any new agricultural structure that is larger than 7,500 square feet building footprint and that is proposed to be sited within the EPO-1 or EPO-2 districts, or any agricultural structure proposed to be built within 100' of a stream or wetland shall be required to meet all requirements and procedures of this Modified Site Plan Review</p>	TBD

		<p>pursuant to this sub-section. Any other agricultural buildings are exempt from the provisions of this section.</p> <p>An application to the planning board shall be required for any agri-tourism event with an expected attendance of over 300 people per day.</p>	
59	CAP 180-29, C (2)(b)(6) p.102	6) A showing or statement by the applicant that any exterior lighting newly installed shall be downward-directed and installed so that no part of the light bulb or light source is visible beyond the property boundary.	TBD
60	CAP 180-29 B (3) p.102	<p>Remove "as per 180-29 (B) (2)"</p> <p>3) Structures associated with a farm operation, commercial horse boarding operation and riding academy, and other agricultural structures as defined under N. Y. State Building and Fire Code Regulations and agricultural land uses, with the exception of roadside stands for the sale of agricultural products from a permanent structure. See Section 180-29 (C) (2) for Modified Site Plan Review for Certain Agricultural Uses as per subsection 180-29 (B) (2). Temporary roadside stands smaller than 100 square feet are exempt;</p>	TBD
61	CAP Def	<p>Wedding Receptions - sub paragraph related to farming operations, modify as follows: Wedding Reception, Parties, Private Event Facility as part of a Farm Operation: See Agri-tourism and 180-29, C, (2). On farm wedding receptions, parties and special events (e.g. Harvest festivals, ag-tourism, tastings, petting zoo) including charitable events, held at farms which market their crops as wine, beer, cider and distilled spirits or food products grown on the farm are considered by New York State to help market the farm's product. New York State considers such activities as part of a farm operation under certain conditions. The events, whether public or private must be 1) directly related to the sale and promotion of the beverage produced at the farm (from at least 51% on farm produced grain, hops, grapes/fruit/juice) or directly related to the sale and promotion of the crops, livestock and livestock products produced at the farm; 2) incidental and subordinate to the retail sale of the farm's crops, livestock and livestock products or beverages on-site; 3) hosted by the farm (not outside, unrelated parties); and 4) feature the beverage or the farm's crops, livestock and livestock products produced at the farm. These events shall be incidental to the farm operation when the gross annual sales from the event sales does not exceed 30% of the total gross sales from the retail sale on-site of the product produced at the farm at such events. The primary purpose of the event is to sell the farm's agricultural commodities and not to gain admission fees, rental income, or other income. Wedding</p>	TBD

		receptions, parties, and private event facilities that do not meet these criteria even when located on a farm premise shall not be considered part of the farm operation. Overnight lodging related to a wedding reception, party, or private event as part of a farm operation shall be allowed only when it meets the definition of a bed and breakfast.	
62	CAP 180-60	Modify the length of the non-use period or consider a Farming exception. Discontinuance. When any existing nonconforming use of land or buildings has been discontinued for one year , the land and buildings shall thereafter be used only in conformity to this chapter, except that the Planning Board, upon application by the owner and after a public hearing, may permit the resumption of said nonconforming use utilizing the general special use standards of this Chapter. No such application shall be considered or granted after three years following the discontinuance.	TBD
63	CAP Def	Modify the definition for food processing as follows to include home occupations: FOOD PROCESSING – a facility as part of a farm operation where farm products primarily grown or produced on the farm, as well as materials from outside resources necessary to produce a farm product , are processed into meat foods, or a facility where plants and plant products are processed into canned, frozen, or fresh food products. Animals can be processed on farm (chickens, etc.) under the exemption from federal inspection for on farm slaughter. (See https://www.agriculture.ny.gov/FS/industry/04circs/Art5BsaleofmeatCIR914.htm) A similar facility not part of a farm operation, or a home occupation , is a commercial use allowed only in the I district.	TBD
64	CAP Use Table	Remove food processing completely from the use table. (Alternately - add food processing as a home occupation)(Also, need to make clear these uses are part of the definition of agriculture/farm operation.)	TBD
65	CAP Def & Use Table	Add a definition for animal slaughter facility and determine what zones it is appropriate to be assigned. (Slaughter facility are highly regulated and complicated.) As is, slaughter house would be prohibited as it is not included in the use table.	TBD
66	CAP Use Table	Remove "Commercial Horse Boarding" and Farm Market (on a farm) indoor selling. (Also, need to make clear these uses are part of the definition of agriculture/farm operation.)	TBD

67	CAP STR	Consider an exemption of "same parcel" requirement for STR over 30 days from farms. §180-58(Z)	TBD
68	DEF	Expand the definition for "pond."	TBD
69	180-39, B (1)(a) p. 148	Consider deleting the last sentence of (a). (1) The Planning Board shall review all small-scale mining permit applications in accordance with the standards for approval of a special use permit under §180-30 and the following provisions: (a) Permit renewals may be granted at the discretion of the Planning Board if the activity is proceeding in accordance with the provisions of the initial plan. No more than one permit renewal shall be granted.	TBD
70	180-39, C, (1) p. 149	What are the basis for these amounts? Are they arbitrary? (1) Reclamation shall occur after the removal of 750 yards or 1,000 tons of mineral, unless the Town Planning Board determines that a different reclamation schedule is more appropriate.	TBD
71	180-39, C, (2)	Change wording as it is not possible to return the mining area to its' original state. (2) All final site drainage shall be designed, sloped, revegetated or treated by other measures so that drainage patterns, including volume and outflow points, will be the same as before the mining occurred , unless an alteration of patterns would improve drainage in the surrounding area.	TBD
72	180-39, C, (4)	Questions the removal of boulders (although the sentence states they can be buried). 4) All restoration material used in the final grading of the site shall be free from refuse or toxic contaminants and shall be compacted as much as is practical, such as by installation in layers. Stumps, boulders and nontoxic debris generated by the mining operation shall be removed from the site and disposed of or buried and covered with a minimum of two feet of soil.	TBD
73	180-36 B, (3) p.131	Consider increasing the time requirement as this may be burdensome. 3) Any manufactured home or stick-built housing used for farm worker housing shall be removed from the premises within six (6) months of cessation of a farm operation, unless the premises have been properly subdivided into conforming lots. In such a situation, the manufactured homes and/or stick-built housing are permitted to remain on the premises, subject to all density, frontage and setback regulations of the Town of Chatham Zoning Law.	TBD
74	180-36, D	Change accessory structure set back to the current 10' requirement.	TBD

	(2) p.133	(2) Accessory structures shall have a minimum yard setback of twenty feet from any property boundary line.	
75	180-36 D, (5) p.133	Why? Many times the reverse is necessary prior to construction of the primary residence. 5) Accessory structures shall not be constructed or established prior on a lot until the primary structure is completed or the primary use is established. There must be a primary structure and/or use in existence and completed before any construction can take place for an Accessory structure.	TBD
76	180-36 D, (6) p.133	This seems arbitrary. Consider removing. 6) Except for agricultural structures, detached accessory structures shall be located no closer to the primary building than the maximum height of the tallest building on the residential lot.	TBD
77	180-41, E, (4) p.151	Two vehicles is limiting for contractors that may have multiple types of vehicles for their occupation. Consider adding a definition for "contractor's yard" and incorporating into the language. (4) There may be no more than two vehicles used in connection with the operation of the business on the premises. Any such vehicles shall be screened or stored in an enclosed structure. However, this does not refer to a passenger vehicle and/or pickup truck used by the occupants for their personal use. CONTRACTOR'S YARD Any space, whether inside or outside a building, used for the storage or keeping of construction equipment, machinery or vehicles or parts thereof, which are in active use by a construction contractor	TBD
78	Def	Add a statement to the "mixed uses" definition indicating home occupations are not mixed uses.	TBD
79	180-13 (G)	Flag lots may be needed to access currently existing lots that are landlocked having no road frontage and as per the Plan, the Board recognizes that there may be unique circumstances where a flag lot would be beneficial to protect views or other resources and the Planning Board should have the ability to allow for that in certain circumstances. Discuss clarifying 180-13 (G) to reflect this.	TBD

