

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
1	2022-06-09 K. Gilbert	Zoning Districts	Would you please identify the amounts of acreage in each district, both current and proposed?	Will do this analysis after the PC reviews the map and makes any changes.	
2	2022-06-22 J. Gilbert 2022-06-30 K. Gilbert	Village Business Section 2101	Requests that the minimum front setbacks not be reduced to 5 feet and existing setbacks be retained.	There are some properties in the proposed VB district with setbacks of 5 feet or less. 5-foot setbacks are appropriate in a walkable village center, particularly for storefront type buildings. The relationship between buildings and the street is an essential component of village character and that relationship is lost when setbacks are too deep. Do not recommend setting the setback higher than 10 feet.	PC agreed to retain the 5-foot front setback, but requested a language change to clarify that the measurement is from the edge of the right-of-way.
3	2022-06-22 J. Gilbert 2022-06-30 P. Gilbert K. Gilbert	Village Business Section 2101	Requests that the maximum lot coverage not be increased to 80%.	There are properties in the proposed VB district with 80% lot coverage or higher. As described in the 2020 Town Plan, these areas are intended to provide "space for housing and suitable business and service establishments to provide employment opportunities and commercial and service facilities for local residents and visitors." Given the limited extents of the VB zone, it is necessary to use land more efficiently and at greater intensity than in rural or residential areas of town. Do not recommend setting the maximum lot coverage at less than 75%.	PC requested more information about existing lot coverage on various properties in the villages. After reviewing, the PC reduced the maximum lot coverage to 60%.
4	2022-06-30 P. Gilbert K. Gilbert	Village Business Section 2101	Requests that the minimum lot size not be decreased.	The proposed reduction is consistent with the traditional settlement pattern. It makes nearly all the lots in the VB district conforming. It will not create any significant opportunity for subdivision of additional lots due to limited frontage and current configuration of development. It also positions Dorset to be able to pursue a Neighborhood Development Area designation in the future if so desired to support housing creation in the villages. No change is recommended.	PC agreed to keep the proposed minimum lot size at 10,000 sf.
5	2022-06-20 L. Bowden 2022-08-02 L. Bowden	Village Business Section 2101	Requests that her property in Dorset Village on Route 30 adjacent to the Barrows House continue to be zoned Village Residential rather than Village Business.	Village Business district was extended to include this lot because the re-zoning proposes to place the cemetery (on the other side of the Bowden parcel) in the RRP and that would leave a single parcel zoned Village Residential disconnected from the remainder of the district. The re-zoning does not obligate the property owner to change any aspect of the current use or condition of the property. The deep setback of the house means that this property does not have village residential form. The parcel is not included in the design review overlay district. Consider placing the parcel in the Rural Residential district. In the same area, consider re-zoning the two parcels proposed for Rural Mixed Use (across Route 30 from the cemetery) that are within the design review district to Village Business.	PC agreed to the recommendation to adjust the proposed VB boundary to include the two parcels across Route 30 from the cemetery.  Following further discussion with the property owner, the PC agreed to adjust the proposed boundary to place this parcel in the proposed RR district.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
6	2022-06-30 P. Gilbert	Village Business Section 2101  Village Mixed Use Section 2102	Requests that side and rear setbacks not be reduced and that maximum building height not be increased.	The proposed reduction would result in setbacks that would better match the traditional development pattern. Many village buildings currently do not conform to setbacks because those setbacks are based on a suburban development model. Do not recommend increasing side or rear setbacks above 15'.  The maximum building height is 35' in all areas of town but the current Village Commercial district. The core of the villages should be the area of town that is the most densely and intensively developed. It is not consistent with the overall planning goals of the community as expressed in the Town Plan to have greater restrictions on building mass or height in the village cores than in other areas of town. No change recommended.	PC agreed to change rear and side setbacks in the VMU to 15' and retain proposed setbacks in VB.  PC agreed to retain the proposed height standard of 35'.
7	2022-06-30 P. Gilbert	Village Business Section 2101  Village Mixed Use Section 2102	Requests that allowable residential density not be increased as proposed. Concerned that buildings will be demolished to make way for larger-scale development.	The density standards were based on state guidance for promoting housing creation in village centers. The increase in density is another element that positions the town for future participation in state programs like the NDA. The lack of infrastructure is currently, and will continue to, limit the potential for infill housing in the villages. Changing the zoning setting before there is infrastructure in place may encourage more creative approaches that would create needed housing in the village. Demolition would be regulated in Dorset Village by the Design Review Overlay District and historic preservation standards would largely prevent it from occurring. No change recommended.	PC agreed to retain proposed residential density.
8	2022-06-13 J. Coleman  2022-06-27 S. Ludlam  2022-07-05 M. Canavan  2022-07-22 J. Mirenda	Village Mixed Use Section 2102	Requests that the Village Residential zoning on Mad Tom Road in East Dorset be retained rather than re-zoning to the proposed Village Mixed Use. Expressed concern about traffic and other impacts of businesses in what is currently a residential area.	Recommend placing lots fronting on the north side of Mad Tom Road proposed for VMU back into VR. Current town office parcel could be zoned RRP if it is to be converted to a park in the future. Consider whether properties fronting on Village St may be more suitable for inclusion in VMU.	PC agreed to adjust the district boundaries on Mad Tom Road as recommended.  PC agreed to further consider proposed zoning along Village St.
9	2022-06-07 K. Nichols	Village Residential Section 2103	Requests that her two lots off Route 30 adjacent to Long Trail Auto be zoned Village Business rather than Village Residential.	Not aware of the current business use of these properties when first version of map was drawn. Recommend making requested change and include third parcel that fronts on Route 30.	The PC agreed to expand the proposed VB district to include the entire area recommended.
10	2022-07-10 B. Thompson	Village Residential Section 2103	Requests that his lot across Route 30 from J.K. Addams not be re-zoned Village Residential from Rural Residential. The existing home on the property has a footprint larger than 3,000 sf and it would become non-conforming and unable to be expanded in the future.	Recommend moving the Village Residential boundary back to its current location. The three parcels directly across Route 30 from J.K. Adams do not have a village residential form. The homes are not visible from the street. Those lots could be returned to the Rural Residential zone or moved into the Rural Mixed Use zone.	The PC agreed to make the recommended change in the proposed VR boundary.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
11	2022-06-27 R. Tanenhaus E. Tanenhaus	Dorset Village	Expressing the sentiment that Dorset Village should remain as it is. No changes should be made to zoning.	Changes in Dorset Village are possible and have occurred under the adopted zoning. Change will continue to occur in the future. It is not legally possible to regulate that the village be “frozen” as it exists today. The zoning is intended to shape and guide future change in conformance with the Town Plan. The proposed zoning does this more effectively than the adopted zoning. It is better aligned with the existing built form of the villages and the mix of uses that historically and currently have occurred in the villages. No change recommended.	No action is needed in response. PC noted this is a topic where further education could be useful.
12	2022-06-20 L. Bowden 2022-06-30 P. Gilbert	Maximum building footprint	Requests that the maximum building footprint of 2,000 sf be retained in the Village Business district.	It may be useful to post the information we have on building sizes in the villages that the PC reviewed when we worked on the district standards. Many existing buildings in the villages have a footprint that exceeds 2,000 sf (including the Bowden house). The adopted standard effectively prevents new construction in the villages, which is not in conformance with the policies of the 2020 Dorset Town Plan. Using a maximum footprint to ensure new buildings are compatible in scale with traditional village buildings is a recommended approach, but the footprint size needs to be set to a number that allows reasonable opportunity for new construction. The Barrows House has a footprint of >4,500 sq ft. The Dorset Inn is >8,000 sf and the Field Club is >5,000 sf. No change recommended.	The PC agreed to retain the proposed 4,000 sf footprint.
13	2022-07-06 P. Carroccio	General Business Section 2104	Concerned about lot size and would like more opportunity to create additional lots. Also notes that there are some subdivided lots not shown on the tax maps that may be affected by the zoning boundary changes.	The proposed zoning change would likely limit any further subdivision of lots within the Tennis Way business park and the J.K. Adams site, but it would allow for multiple principal buildings and uses on a lot which provides some potential for further infill. More information about previously approved subdivisions is needed before considering any recommendations.	PC agreed to lower the lot size to 2 acres and make related adjustments to the dimensional standards.
14	2022-06-28 J. Maher 2022-07-24 J. Maher	Rural Mixed Use Section 2105	Requests that the area along Route 30 that includes the Williams store not be re-zoned to Rural Mixed Use and the current Rural Residential zoning be retained.	There are a number of non-residential uses in addition to the Williams store in the proposed RMU district. The current RR district allows for a range on non-residential uses. The proposed regulations take a different approach and identified those rural areas with highway access and few resource constraints that are more suitable for business locations for inclusion in a new RMU district. The remaining RR land will have significantly less opportunity for nonresidential uses under the proposed regulations than it does today under the adopted zoning. No change recommended other than the adjustment to the boundary with VB recommended in #5.	PC agreed to retain the proposed RMU zoning in this area.
15	2022-06-29 A. Stauffer	Rural Mixed Use Section 2105	Requests that the Dorset Field Club not be re-zoned to Rural Mixed Use and be retained in Rural Residential.	The Field Club property is also within the Design Review Overlay district. The likelihood of land fronting on West Road being sold for commercial development is very low and the standards in place would be adequate to ensure quality architectural and site design, and address other compatibility and impact concerns. No change recommended.	PC agreed to retain the proposed RMU zoning in this area.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
16	2022-06-07 R. Gaiotti 2022-07-15 M. Hand	Rural Residential Section 2106	Consider a smaller minimum lot size to create more opportunity for housing.	About one-third of the parcels in the RR district are under the minimum lot size (currently 120,000 sf). Looking at the resource maps, it would appear that much of the readily developable land has been subdivided and built on. Lowering the minimum lot size to two acres may create a small increase in potential for residential lots. Another option for expanding housing potential would be to allow two dwelling units on any lot.	PC agreed to retain the proposed 3 acre minimum lot size.
17	2022-06-13 S. Stewart	Rural Residential Section 2106	Requests that the area around Timberbrook Road continue to be zoned Village Residential rather than the proposed Rural Residential. Requests that the Village Residential zoning also be extended to Owls Head Lane area.	The Timberbrook and Owls Head subdivisions do not have a village residential form. The houses are located on a cul-de-sac with no relation to the street or one another. The Timberbrook subdivision was developed at a much lower density than the land was zoned for leaving the existing lots with theoretical infill potential under Village Residential zoning. However given the lack of road frontage, configuration of the parcels and siting of the homes, it is unlikely that any meaningful amount of that potential could be realized.	PC agreed to retain the proposed RR zoning in this area.
18	2022-06-13 S. Stewart	Rural Residential Section 2106	Requests that the land currently zoned Village Residential on Mad Tom Road proposed to be re-zoned Rural Residential be retained as Village Residential.	There is a physical break in the village form due to terrain that the proposed zoning boundary was intended to reflect. There is, however, another cluster of small lots with homes oriented to the street beyond that point. Recommend re-drawing the boundary to more closely match the existing configuration, taking in those existing smaller lots where Mad Tom Road turns to the north but not continuing to the east beyond Mad Tom Road.	PC agreed to adjust the boundary of the proposed VR district to take in the land along Mad Tom Road up to the sharp turn.
19	2022-06-07 J. Calder	Rural Resource Protection Section 2107	Requests that further development on the higher elevations of Mt. Aeolus not be allowed. Concerned about increased traffic on Pine Road.	There is the potential for housing to be built upslope from Pine Road under the currently adopted zoning. There would continue to be potential for such development activity under the proposed zoning. The natural resource protection and other standards of the proposed regulations are more robust than what is in place under current zoning. No change recommended.	PC reviewed standards in place under proposed regulations and agreed no change was needed in response to this comment.
20	2022-06-28 B. Breed	Rural Resource Protection Section 2107	Requests that his parcel on the Danby Mt. Road not be placed entirely in RRP and that the portion below 1,600' remain in RR as currently zoned. A portion of the property is under a conservation easement but that does not include the area below 1,600'.	Recommend making this change. The mapping shows the 1,600' contour passing through the house. Mr. Breed did communicate that the survey prepared when the house was built shows the building to be below 1,600' but just. That is consistent with the mapping, which has a resolution of +/-2 feet.	The PC agreed to make the recommended change.
21	2022-07-07 H. Chandler	Rural Resource Protection Section 2107	Requests that his parcel not be included in the RRP. Only a small portion of the parcel is subject to a conservation easement.	Given that the property is below 1,600' and the area subject to a conservation easement is a minor portion of the parcel, recommend re-zoning to RR.	The PC agreed to make the recommended change.
22	2022-06-09 K. Gilbert 2022-06-20 L. Bowden	Design Review Overlay Section 2203	The goal to "maintain the small, rural, primarily residential appearance of the Historic Districts" appears to be no longer an objective since this wording has been removed and since much of the Village is proposed to change from Village Residential to Village Business or Village Mixed Use.	The quoted language, which is part of the purpose statement of the adopted design review overlay district, is from a prior version of the Town Plan. That language is no longer found in the Dorset Town Plan. The 2020 Town Plan envisions future land use in the town's three villages to be "mixed use and concentrated residential." The villages are "intended to accommodate a large proportion of Dorset's commercial and residential growth." No change recommended.	PC reviewed language in the current town plan and made no changes to the proposed regulations in response to this comment.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
23	2022-06-09 K. Gilbert	Design Review Overlay Section 2203	Requests that seamed metal roofing no longer be allowed in the district and requests that composite roofing intended to mimic the appearance of slate or wood shakes be allowed.	Historic preservationists consider metal roofing to be an appropriate material suitable for use on historic structures. Use of composite roofing materials is generally not considered appropriate on historic structures. Where there is an existing slate roof, the preferred option is always repair rather than replacement with another material. Consider strengthening the language about retaining original roofing materials where they exist.	PC agreed to strengthen the language related to retaining original building materials.
24	2022-06-09 K. Gilbert S. Childs J. Clubb 2022-06-13 J. Coleman 2022-06-20 L. Bowden 2022-06-22 J. Gilbert 2022-06-27 R. Tanenhaus 2022-06-30 P. Gilbert	Event facilities	Request that event facilities be removed as a conditional use in the Village Mixed Use and Village Business districts.	Recommend eliminating the event facility use from VB and VMU at this time, but retaining it in the other districts where it was proposed to be allowed, along with the related standards. The town may still need to work on how to regulate and manage the existing event-hosting businesses in Dorset Village and East Dorset at a future time. By defining event facility as a distinct use, those businesses will become non-conforming uses subject to the standards of Section 1302.	The PC agreed to eliminate the event facility use from the proposed VB and VMU districts.
25	2022-06-13 S. Stewart	Buildable lot area Section 2008	Requested buildable lot area be included in the definitions not just in Subsection 2008.H.	We retained the “buildable lot area” concept from the adopted regulations. Given that most development in Dorset is occurring at densities well below what is allowed under zoning, the standard may not be influencing development outcomes and it adds complexity. Consider eliminating “buildable land” approach altogether. If retained, add cross-references for clarity and eliminate reference to density bonus (those are no longer offered).	PC agreed to eliminate the reference to buildable land from the proposed regulations altogether.
26	2022-06-13 S. Stewart	Parking Section 3104	Requests that the minimum duration of a shared parking agreement be reduced from the proposed 20 years.	Recommend retaining the 20-year period but clarifying that the agreement can be amended at any time provided the minimum required parking continues to be provided by an alternative means.	The PC retained the 20-year requirement and requested the language be clarified.
27	2022-06-13 S. Stewart	Parking Section 3104	Requests requirement for paving parking areas and delineating spaces be eliminated	Recommend retaining the 10-space threshold for paving and space delineation, but expanding the PC’s authority to modify for parking areas that are not going to be used on a daily basis. The reason for the requirement is the difficulty of maintaining a safe and accessible surface condition as the level of vehicular use increases, particularly in mud season.	The PC eliminated the requirement for larger parking areas to be paved.
28	2022-06-09 A. Tarantino 2022-06-13 S. Stewart	Short-term rental Section 3208	Interpreted Section 3208 to prohibit month-to-month lease agreements. Also asked about whether pre-existing STRs would need to get a zoning permit.	Recommend further revisions to Section 3208 to clarify the difference between short-term rental and long-term rental (30 consecutive days under VT statute) and the “grandfathering” of existing rental properties.	The PC agreed with the recommendation to clarify the language.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
29	2022-07-06 B. Fielding 2022-07-15 M. Hand	Rural Mixed Use Section 2105	Requests his property on Route 30 not be re-zoned to RMU because of reduced opportunity for subdivision and residential development.  Also received a similar request to not increase the minimum lot size in the RMU above the 120,000 sf currently allowed in the Agricultural and Rural Residential district.	Parcel is 5.5 acres and could not be further subdivided under the proposed 3 acre minimum lot size in RMU. It would be possible to develop the lot with up to three dwelling units under the proposed regulations. Mixed use development is allowed so a portion of the property could be developed with housing and another portion could have a business located on it without the need to subdivide. This parcel is in an area of town currently zoned Village Commercial. This area of town is not a traditional settlement area and does not have village form. The primary land use pattern is highway commercial. The RMU district is the appropriate district for this area of town. Retaining village zoning is not recommended. The existing business were established prior to this area being zoned village and are now nonconforming because of that zoning change. The change to RMU will make those businesses conforming and allow for similar development in the future, which is currently not possible. A reduction of the minimum lot area required per dwelling could be considered if the PC wants to pursue expanding opportunity for housing in the RMU.	The PC agreed to reduce the minimum lot size in the proposed RMU to 2 acres and make related adjustments to dimensional standards.s
30	2022-07-21 R. Fox	Rural Mixed Use Section 2105	Requests that the RMU district be broken up into two districts with differences in the uses allowed to distinguish between larger parcels further out from the villages and the smaller parcels closer to the villages.	Recommend keeping a single district but making the following changes to the allowed uses: (1) Move industrial uses #27-30 from permitted to conditional; and 202(2) Add a provision making any allowed commercial, art, entertainment or recreation use on a lot less than 3 acres a conditional use.	The PC agreed to the recommended change and also made event facilities a conditional use in the GB district.
31	2022-07-22 K. Gilbert	Landing Areas Section 3218	Requests that landing areas be prohibited.	This is a policy decision the PC needs to make. A prohibition may not withstand a legal challenge. The question is whether it is better to take a chance on no one challenging the prohibition or to allow with conditions to mitigate impacts to the extent more clearly allowed under the law.	The PC decided to prohibit language after further consultation with the town's attorney. The PC will draft an amendment to the town plan to strengthen the town's prohibition.
32	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests clarification to the de minimis language in Subsection C related to whether it applies to new or replacement facilities.  Also requests PC to reconsider the size/area limitations proposed to be de minimis in Subsection C.	This provision is a statutory requirement. The statute simply refers to "telecommunication facilities" without specifying whether the facility is new or a replacement. Practically, the standards that define de minimus effectively limit the provision to replacement of existing equipment or mounting small antennas on existing structures. No change recommended.  There is no guidance in statute or case law on how to define "de minimis" in this specific application. The PC has latitude to craft a definition and alter the limits if it agrees the proposed numbers are too permissive.	The PC retained the language as drafted.
33	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests that the a maximum height for telecommunications towers be established that does not exceed the height of the tower behind the Williams store.	The town could set a height limit but if the applicant can demonstrate that a taller tower is necessary to provide service, the town's height limit would not withstand a legal challenge under the Telecommunication Act. Also given that applicants can apply to the Public Utility Commission instead of the town, a height limit would not be effective. No change recommended.	The PC retained the language as drafted.

**TOWN OF DORSET PROPOSED LAND USE REGULATIONS PUBLIC COMMENT MATRIX**

**26 SEPTEMBER 2022**

#	DATE   BY	SECTION / DISTRICT	COMMENT	RESPONSE / RECOMMENDATION	PC DECISION
34	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests that Paragraph (6) from Subsection K be included as a criteria under Subsection J as well. The criteria requires the antenna and related appurtenances and wiring be screened from the road.	Subsection J, which applies to surface-mounted antennas, requires the antenna and related appurtenances to be the same color as the surface to which they are attached. This effectively achieves the same goal as requiring a parapet or similar screening of a roof-mounted antenna. No change is recommended.	The PC retained the language as drafted.
35	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests that any new facility be designed as a stealth facility.	The section is set up with a list of siting priorities in Subsection G. That approach largely achieves the objective being sought by the request. An applicant would have to demonstrate that a stealth facility is not a technically feasible option for providing the service before a more conventional tower would be allowed. Faced with these regulations, an applicant that wants to build a conventional tower will likely choose to seek a CPG. No change is recommended.	The PC retained the language as drafted.
36	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests that any lighting on a tower be prohibited.	The town does not have the authority to prohibit lighting if the lighting is required to meet FAA or FCC rules. No change recommended.	The PC retained the language as drafted.
37	2022-07-20 K. Gilbert	Towers and Antennas Section 3219	Requests that towers be prohibited on ridgelines.	The town could prohibit ridgeline siting but if the applicant can demonstrate that a ridgeline is the only location that allows them to provide service, the town's prohibition would not withstand a legal challenge under the Telecommunication Act. Also given that applicants can apply to the Public Utility Commission instead of the town, the prohibition would not be effective. No change recommended.	The PC retained the language as drafted.
38	2022-07-22 K. Gilbert	Shooting Range Section 3221	Requests that outdoor shooting ranges be prohibited.	This is a policy decision the PC needs to make. The questions are to what extent is outdoor shooting a traditional rural activity and a reasonable land use in a rural area, and to what extent is Dorset a rural area vs. a residential/suburban area?	The PC agreed to retain the section as drafted.
39	2022-07-20 J. Calder	Subdivision Review Section 4310	Requests that review standards for proposed new roads within a subdivision include consideration of "quality of life, peace and quiet, and property value of existing homeowners."	Subdivision review criteria # 11 and #12 in Figure 4-02 allow the PC to consider character of the area and transportation impacts. Those criteria could address the concerns raised to the extent allowed under the law. No change recommended.	The PC made no further changes in response to this comment.
40	2022-08-02 D. Rose	Village Residential Section 2103	Requests that 1288 Route 30, which is currently zoned Village Commercial, not be re-zoned to Village Residential. Currently two businesses are being operated from this residential property.	Most of the area currently zoned Village Commercial in South Dorset is being included in the proposed Village Mixed Use. It was not evident that there was business activity occurring on the lots proposed for Village Residential. The PC could expand the VMU boundary to take in the three lots up to the JK Adams property, which would more closely reflect the current zoning.	The PC agreed to extend the VMU district to the JK Adams site.
41		Rural Residential Section 2106	Requests that all lots fronting on the Danby Mountain Road above the 1,600-ft elevation be included in the RR rather than RRP district.	The lots in question are currently in the Forest 2 district. The land is largely developed. Irrespective of district, there is limited opportunity for additional lots or homes.	The PC agreed to move all lots fronting on Danby Mountain Road above 1,600 to RR.