



State of Rhode Island
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879-1900

(401) 783-3370
Fax (401) 783-2069

PUBLIC NOTICE

File Number: 2021-03-007 Date: March 15, 2021

This office has under consideration the application of:

Matthew Behan
Behan Family Farms, LLC.
59 Maxson Hill Road
Ashaway, RI 02804

for a State of Rhode Island Assent to construct and maintain: a 2.05 acre expansion to an existing oyster farm using cages and racks as the grow-out method.

Project Location:	Ninigret Pond
City/Town:	Charlestown
Waterway:	Ninigret Pond

Plans of the proposed work may be seen at the CRMC office in Wakefield.

In accordance with the Administrative Procedures Act (Chapter 42-35 of the Rhode Island General Laws) you may request a hearing on this matter.

You are advised that if you have good reason to enter protests against the proposed work it is your privilege to do so. It is expected that objectors will review the application and plans thoroughly, visit site of proposed work if necessary, to familiarize themselves with the conditions and cite what law or laws, if any, would in their opinion be violated by the work proposed.

If you desire to protest, you must attend the scheduled hearing and give sworn testimony. A notice of the time and place of such hearing will be furnished you as soon as possible after receipt of your request for hearing. If you desire to request a hearing, to receive consideration, it should be in writing (**with your correct mailing address, e-mail address and valid contact number**) and be received at this office on or before April 15, 2021.



State of Rhode Island and Providence Plantations
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879-1900

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APPLICATION FOR STATE ASSENT

To perform work regulated by the provisions of Chapter 279 of the Public Laws of 1971 Amended.

Project Location <u>NIWIGRET POND CHARLESTOWN, RI</u> No. Street City/Town			File No. (CRMC USE ONLY) <u>2021-03-007</u>
Owner's Name <u>MATTHEW J. BEHN</u>			Plat: Lot(s):
Mailing Address <u>59 MAXSON HILL RD</u> City/Town <u>ASHAWAY</u> State <u>R.I</u> Zip Code <u>02804</u>			Contact No.: <u>401-714-7031</u>
Name of Waterway <u>NIWIGRET POND</u>			Estimated Project Cost (EPC): <u>\$20,000.00</u> Application Fee: <u>\$250.00</u>
Longitude/latitude of all corners of Proposed Aquaculture Project Location (preferably in decimal degrees): <u>NW: 41° 21' 15.34" N</u> <u>71° 39' 55.58" W</u> <u>NE: 41° 21' 15.448" N</u> <u>71° 39' 55.288" W</u> <u>SW: 41° 21' 7.63" N</u> <u>71° 39' 55.78" W</u> <u>SE: 41° 21' 8.488" N</u> <u>71° 39' 53.053" W</u>			

Have you or any previous owner filed an application for and/or received an assent for any activity on this property?
(If so please provide the file and/or assent numbers): NO

Is this site within a designated historic district? ☐ YES ☒ NO

Is this application being submitted in response to a coastal violation? ☐ YES ☒ NO

If YES, you must indicate NOV or C&D Number: _____

Name and Addresses of adjacent property owners whose property adjoins the project site. (Accurate addresses will insure proper notification. Improper addresses will result in an increase in review time.)

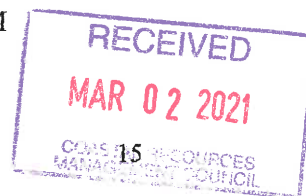
THERE ARE NO PROPERTY OWNERS ON THIS STRETCH OF NIWIGRET POND, IT'S ADJACENT TO THE NIWIGRET NATIONAL WILDLIFE REFUGE. THE ADJACENT OYSTER LEASE IS OWNED BY JULES OPTON-HARRIS

STORMTOOLS (<http://www.beachsamp.org/resources/stormtools/>) is a planning tool to help applicants evaluate the impacts of sea level rise and storm surge on their projects. The Council encourages applicants to use STORMTOOLS to help them understand the risk that may be present at their site and make appropriate adjustments to the project design.

NOTE: The applicant acknowledges by evidence of their signature that they have reviewed the Rhode Island Coastal Resources Management Program, and have, where possible, adhered to the policies and standards of the program. Where variances or special exceptions are requested by the applicant, the applicant will be prepared to meet and present testimony on the criteria and burdens of proof for each of these relief provisions. The applicant also acknowledges by evidence of their signature that to the best of their knowledge the information contained in the application is true and valid. If the information provided to the CRMC for this review is inaccurate or did not reveal all necessary information or data, then the permit granted under this application may be found to be null and void. Applicant requires that as a condition to the granting of this assent, members of the CRMC or its staff shall have access to the applicant's property to make on-site inspections to insure compliance with the assent. This application is made under oath and subject to the penalties of perjury. 08/04

Owner's Signature (sign and print)

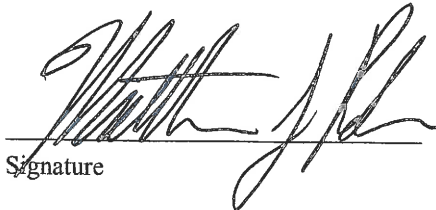
PLEASE REVIEW REVERSE SIDE OF APPLICATION FORM



STATEMENT OF DISCLOSURE AND APPLICANT AGREEMENT AS TO FEES

The fees which must be submitted to the Coastal Resources Management Council are based upon representations made to the Coastal Resources Management Council by the applicant. If after submission of this fee the Coastal Resources Management Council determines that an error has been made either in the applicant's submission or in determining the fee to be paid, the applicant understands that additional fees may be assessed by the Coastal Resources Management Council. These fees must be paid prior to the issuance of any assent by the Coastal Resources Management Council.

The applicant understands the above conditions and agrees to comply with them.

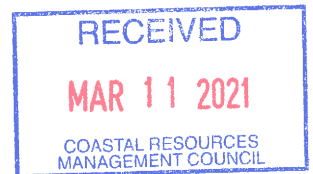

Signature

02/27/21
Date

MATTHEW J. BEKOW
Print Name and Mailing Address

55 Maxson Hill Rd.
Ashaway, RI 02804





Matthew J. Behan
Behan Family Farms LLC
59 Maxson Hill Rd. Ashaway, R.I 02804

Prepared on: February 28th 2021

DEM Aquaculture License #000062 POT

R.I Shellfish Shipper #RI 489 SS

D.E.M Harvest Classification: Approved

Overview

This lease proposal is an expansion of an existing lease. Ten years ago we began on a 3-acre lease with the intention of growing Eastern Cupped oysters (*Crassostrea virginica*) and hard shell clams (*Mercenaria mercenaria*). Well the hard clam idea didn't work out very well so we ditched that effort and went full bore on oyster production, which has taken off and our prized Ninigret Nectars are being eaten all over the United States and even up into Canada. The business plan is working out so well that we are in need of expansion in order to keep up with a very high demand for our product both locally and nationally. We have been nearly doubling in capacity and seed planted every season or two. When the seed we planted this past season starts to grow this year our entire existing farm space is going to be completely filled up but the demand is there to grow and sell more.

This is an expansion of existing lease #2016-10-100. We currently have 7.36 acres proposed to expand to 9.41 acres total.

There will be no expansion to the North or South of the existing lease, only moving the Northeast corner over 25' to the East along the existing Northern boundary line and moving the

Southeast corner over 225' further east along the existing Southern boundary line. The area being expanded into is an area not currently used by other farmers or recreational harvesters and experiences very little boat traffic. We will not be seeking any expansion West as per request of the other users of the Pond so as to not block a heavily used boat traffic area leading to a beach access trail. There is a public right of way between the Easternmost edge of my existing lease and the westernmost edge of the Walrus and Carpenter lease (which is our farm neighbor to the East) of 225' at the closest but the right of way is funnel shaped and more open to the south so the area where I am proposing to expand my Southeast corner into has wide open space and ample access to the sandbar/beach. All gear shall have ample water coverage so that kayakers are able to glide over it without conflict.

Operational Plan

We will be using the some of the same gear that we are currently using on our existing farm in the same layout as the existing row arrangement. I say "some" of the gear that we currently use not because we are using any new type of gear but because we are only using one of the three styles that we currently use due to the shallow water depth in this new area. Only single tier cages can be used on this piece of bottom so there will be none of the two- and three-tier rack and bag cages that we can use in the deeper water of the existing farm. Two styles of single tier racks will be utilized: open tops and "1x3's".

The 1x3's are named so for their 1 bag high x 3 bags wide configuration. This style cage holds 3 High Density Polyethylene (HDPE) bags used to grow the oysters inside. The bags are slid inside the cages and periodically stood up to dry. Our drying practices are in strict



adherence to the Best Management Practices of only drying sunup to sundown and only while we are working that day. The other style of cage we will use are a personal modification of the double and triple stack cages that does not use a bag , rather a predetermined density of larger oysters almost ready for market are placed directly into the PVC coated wire mesh cages for optimal flow resulting in optimal growth. These open top cages are proven to be very effective for growing oysters and can be put into shallower water because they do not require much depth at all.

Oysters begin their growing cycle as seed in small gauge HDPE bags in triple stack cages on the western side of the farm. As they grow larger they're graded using a tumbler and restocked at optimum density in larger mesh HDPE bags. After another round of grading, the biofouled gear is taken out of the water and allowed to air dry at a storage facility on land. Once the biofouling is dead, it falls off so the bags or cages are cleaned and ready to go back into the gear rotation without excess algae being dumped anywhere on the lease or in the Pond. This new expansion will not have any seed on it this will be for adult oysters near market and market size only. The origin of the oysters will be seed grown on the existing portion of the farm coming from approved hatcheries such as Mook Sea Farms in Maine, Cherrystone Aqua Farms in Virginia and Fisher's Island, N.Y. All seed is imported with proper histology reports in strict compliance with the National Shellfish Sanitation Program. We will follow Biosecurity Board seed protocols when importing our seed as well.

Markings for the proposed site will be consistent with our markings on the existing farm. The four corners of the proposed aquaculture site will be marked with standard 11" pot buoys . Each buoy will have "CRMC" and our file number written in 3" tall letters on it. My assigned



color is pink so my corner marker buoys will be pink. In areas where a user conflict might occur we put up signs warning of Gear Use Areas. The combination of buoys and signs does a pretty good job of keeping most people out.

Once oysters reach a certain size they will be culled to separate them into “markets” and non-markets. The market oysters are put into a special section of the existing farm where they live in open top cages at a predetermined density until sold to market. On delivery days (Monday and Thursday) we pull the market cages onto the boat to count out and bag our order. Each bag is tagged then dunked into an ice/water slurry if it is during Vibrio season (or any warmer season) before being packed into coolers on ice with lids on them. We bring the market oysters to Ninigret Landing Marina where they are offloaded over the commercial dock and into a waiting, refrigerated and down to correct temperature Behan Family Farms van. Temperature and time is recorded on the farm when the oysters first come out and again at the dock when they are landed. Separate logs of temperature, time and sanitation are now kept by the driver at every step of the delivery route until the van is sanitized when done. Our invoice books track the harvest temp, temp shipped, harvest time and time at dock and also include our R.I Harvest number, Shellfish Shipper license number and all pertinent contact info.

As we have progressed at Behan Family Farms we have learned to grow our seed significantly farther down the life cycle. We now buy our seed at 2mm directly from hatcheries in Maine and Virginia each spring. The different strains are kept in different upwellers in different locations throughout the Pond. We maintain a strict schedule with our upwellers; every day they get a stir and once every 7-10 days the silos are emptied, washed and dried out while the seed are sieved. Close records are kept charting the progress of each different strain



and much care is taken that the strains are never mixed. We harvest the seed out of the upweller and plant it on the growout site in accordance with the requirements that seed must be removed before it exceeds maximum "seed" size threshold, i.e less than 32mm for oysters. Every time we buy seed we notify our CRMC Aquaculture Coordinator and provide a fresh pathology report each time.

Out on the growout site we start the seed in 6mm mesh HDPE bags in our double and triple stack cages. The different strains of seed are kept separate on the farm and are demarcated by short PVC poles at the front (North) side of the rows in the spaces between strains. Each section is referred to by the hatchery of origin of the seed. Detailed daily logs are kept on the farm for both strains charting growth rates, average size and recording daily routines. As the seed gets larger and spreads out into more and more gear, we add gear to the rows in a specific section but the specific strain never leaves its respective area. By doing this we prevent cross-contamination allowing us to differentiate in the event of a recall. The lease is broken up into 4 sections: 2 sections one of each strain of seed then a separate section for each as adults as well as a market section for holding inventory.



Matthew J. Behan

Behan Family Farms

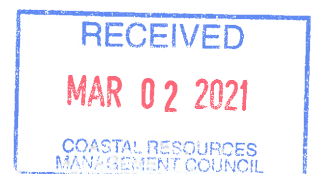
Prepared on: February 27th 2021

Section 300.1

1. The proposed activity in the area to be leased is an expansion of a current shellfish aquaculture lease. Behan Family Farms LLC produces a strain of the Eastern Oyster called Ninigret Nectars. We are experiencing a demand that far exceeds our supply grown on the existing 5.86-acre parcel. To meet our demands we need an expansion of 2 more acres.
2. The lease expansion will have no impact on the land.
3. The proposed site expansion is bordered on the west by our existing aquaculture lease. To the north is the navigable channel going from the Narrows into the Western Basin of the Pond. To the south is open, shallow water for 100' until the beach providing ample space for passerby's in kayak or paddleboard to the south of us. To the east is a public right of way that is very shallow usually around a foot of water and experiences very little boat traffic. The right of way will be over 200' wide still (after the possible expansion) at the northern part and over a 1000' wide past the southern edge of Walrus and Carpenter Farm. The closest land to the north is the northern shore to the west of Hall Point.
4. The proposed activity will not impact the erosion or deposition process along the shore or in tidal waters. The activity is very low impact in these regards.
5. The proposed activity will have nothing but positive impacts on the abundance and diversity of plant and animal life. The proposed cages to be used are considered Fish Aggregating Devices or FAD's which enhance the biodiversity of the pond by creating structure for juvenile fish, crabs, lobsters, etc (all of which we see very often) to hide therefore increasing their chance for survival and in turn their abundance in the Pond. The oysters being grown also help to clean the water by turning excess Nitrogen into a commercial product therefore lowering the chances of harmful algal blooms. These blooms often cause eutrophication which is a process that uses up all the free oxygen in the water resulting in anoxic areas and fish/shellfish kills.
6. The proposed activity is expanding into an area that is not heavily used by the public. All gear being used is designed to have enough water covering it for kayaks to be able to pass safely over it. All of the proposed area is outside of the A.C.O.E designated navigable channels. The proposed activity in the areas will not unreasonably interfere or restrict access to the public to tidal waters and/or shore.



7. The proposed activity includes gear that is well spaced out and moved around periodically so it does not interfere with the natural water circulation, sedimentation, or flushing of the Pond. The filter feeding nature of the cultured shellfish helps clean out the Pond turbidity.
8. The proposed activity will significantly increase the water quality of the Pond. Oysters are known as "Nature's Water Filter" because they are able to clean up massive amounts of water again due to their filter feeding nature.
9. The proposed activity will have no negative impacts on areas of historical or archaeological significance.
10. The proposed activity will have no significant conflicts with other activities including swimming, boating, fishing, navigation or commerce because it is located outside of A.C.O.E defined safe navigable channels. The gear is also designed to allow enough water over it at any tide that kayakers can safely paddle over it. The location of the proposed activity has no recreational fishing appeal or activity and is too shallow to be a concern to boaters or swimmers.
11. The proposed activity follows the trend of minimal adverse scenic impact issues with current Behan Family Farms LLC practices. All gear is at least 1' under the surface of the water at low tide. If not for the required markings on the corners and signage warning of gear use areas there would be nothing visible on the entire farm. Our workboats are respectable boats and are kept tidy while noise pollution is kept to a very bare minimum.



Guidance Document for Aquaculture Operations Plans

Anyone conducting aquaculture operations in RI must comply with all applicable CRMC regulations (*Coastal Resources Management Program* §§ 1.3.1(A) and 1.3.1(K)) and DEM regulations, as set forth in “*Aquaculture of Marine Species in RI Waters*.” Plans provided to the CRMC will be available for DEM review. Modifications to the permit must follow the CRMC process for modification of assent. Separate, individual plans shall be developed and submitted for each aquaculture site/facility (i.e., one for each lease site, one for each upweller location, etc.); provided, however, that if lease sites are contiguous, or part of a single, unified operation, the overall site can be covered by a single plan. Operations Plans shall address each of the items listed below, as applicable, following the format set forth below.

Note: All plans must be type written. This Microsoft Word document is intended to be used by licensees/operators as a template when preparing plans and may be modified as needed to fit the specific needs of the operator.

1. **Name and mailing address** of individual, firm, partnership, association, academic institution, municipality, or corporation who is principally responsible for the aquaculture operation or activity; if corporation, specify and include names of all owners/partners.

Behan Family Farms

Matthew J. Behan (owner/operator)

59 Maxson Hill Rd

Ashaway, R.I 02804

2. **CRMC file number** for the facility; new applications will be assigned a file number by CRMC.
3. **DEM Aquaculture License number** (applicable if products are offered for sale); new applicants will need to obtain the DEM aquaculture license after an aquaculture assent is issued.

AQUA 000062 POT

4. **Type of facility** (e.g., commercial lease site, upweller, experimental site, research, commercial viability) and **nature of operation** (i.e., methodology used).

Commercial lease site. Rack and Bag method

5. **Location of facility** (include aerial or chart depicting exact location)



- NW: 41 21' 15.34"N
71 39' 55.58"W
- NE: 41 21' 15.448"N
71 39' 55.288"W
- SW: 41 21' 7.63"N
71 39' 55.78"W
- SE: 41 21' 8.488"N
71 39' 53.053"W

We will be growing the Eastern Cupped Oyster (*Crassostrea virginica*). We will follow all Biosecurity Board protocols when Importing seed although this particular area I am applying for is not for seed sized oysters. This new addition to the farm will be for adolescent and mature oysters graduating from gear on the existing farm into specific cages for larger oysters in this new section. Seed on the existing farm is attained through strict adherence to the rules in the Biosecurity Board.

Gear to be used on the site will be rack and bag style cages. One type of cage is 3' x 4' with a wire mesh gauge of 1", a divider in the middle and a smaller gauge liner in the bottom. Oysters go directly into these cages without a bag and they have a foot or more water covering them at low tide and 18-24" coverage on high tide. The other style cage is of very similar height (about 8") but holds bags of oysters. These cages also have over a foot of water covering them at low tide and 18-24" coverage at high tide. This expansion should be able to about double our existing area for these single tier style cages. We will have a maximum of 500 new cages on this site, all at least 1' under the low tide level.

8. Description of the *methods and equipment used to identify and mark site.*



In accordance with the CRMC Rules laid out to mark our sites, we will be marking the four (4) corners with 11" x 4" lobster pot buoys **clearly delineating my site**. As per code, these buoys will have my CRMC Assent number written on them in letters no smaller than 3". The corner buoys will be painted pink (my designated buoy marker color in Ninigret Pond). This should be sufficient to eliminate any user conflict confusion: a bright pink buoy with my lease assent number clearly marked in large letters with one buoy at each corner of the site. We will also be erecting a small sign (1' x 1') on a pole to warn boaters of underwater hazards and to clearly state there is no public shellfishing allowed on the lease as per order of the CRMC.

9. DEM *Shellfish Harvesting Classification* at site.

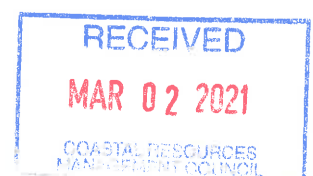
Open Harvest classification.

10. Description of *practices and procedures used* during the growth, harvest, storage, transportation, and sale of the cultured species.

The oysters start their life in a permitted upweller on Ninigret Pond. Once they grow to retain on a 3/8" screen, they are put into 6mm mesh ADPI oyster bags at a certain density and brought out to the growout area on the farm. Here they are loaded into multi-tier bag cages where they will be dried for biofouling dessication and monitored until the density reaches a point where the bag must be run through a machine called a tumbler for sorting and grading. The tumbler separates them into 4 sizes: 3 sizes go back into bags with homogenous sized oysters while the largest, fastest growers are put into the open top style cages for maximum flow and placed into the shallower portion of the lease and/or the new lease we are applying for.

Once the oyster reaches near market size, the cages of loose oysters are dumped onto a culling table on the boat where they are sorted into those that will be going directly to market and those who need a little more time in the cages before going to market. Market sized oysters are put in a different section into pre-counted densities in open top cages. The markets will be stored here on the lease until Harvest Day.

When the oysters are harvested we bring out lots of coolers and lots of ice from a certified pathogen-free ice source. Once on site we note the time and temperature of the water in our harvest logs and prepare an ice slurry to rapidly chill the oysters to under 50 degrees. Once the cages break the water the exact time is noted, oysters quickly counted in the shade and bagged and tagged on site. Harvest day is all hands on deck, we are not doing anything else on the farm, this has our undivided attention. Once bagged and tagged they are dipped in the ice slurry for about 5 minutes then loaded into waiting, pre-chilled coolers then buried in ice. Once we have the order complete we head directly to Ninigret Landing Marina where we offload on the commercial specific wharf. The chilled, fresh oysters are loaded directly into a waiting, pre-chilled refrigerated van then transported directly to a restaurant or distributor.



Meticulous logs are kept recording time and temperature every single step of the way. Time and temp are noted once the oysters break the water surface on my site, again when the oysters hit the dock, and then time and temp again noted on every single stop along the delivery route in the refrigerated van. Twice yearly we are inspected by the Department of Health and I am proud to say we have a very clean record with our inspections.

11. Procedures for ***maintaining records***:

For operations using seed acquired from out-of-state:

No out of state seed will be used on this site. The proposed site is not for seed, the seed is grown out to adult size on my existing site then adults are transferred to the site I am applying for.

Description of notification, disease certification, and labeling/tagging procedures:

On our existing lease we grow out seed purchased from out of state waters at 2mm size. Our sources are tested and certified disease and pathogen free by means of a pathology test from an accredited laboratory. Before the seed is purchased we ask the CRMC Aquaculture Coordinator if the seed is approved. If seed is approved, we get it delivered by air mail and put it directly into our nursery system at the approved, permitted site. The tiny seed is allowed to sit for a few weeks and acclimatize before we start grading it and separating the different sizes into homogenous groups. Once this is started we sieve the animals each week starting at a 2mm screen at week 3. Like all oysters, the seed grow at different paces so on a given week we may sieve half on a 4mm screen while the other half has graduated to being screened on a 6mm screen. Once the oysters are retained on the 3/8" screen they are transferred to the grow out site. Detailed records are kept every step of the way including average size, stocking density, volume when taken out of the water, state of biofoul on silos and screens, etc. We have multiple upweller nurseries so we enable ourselves to only stock one particular strain (with its accompanying pathology report) into one full upweller and never mix different strains in the same upweller.

On the farm, seed from different hatcheries is kept strictly separated from each other. Rows are marked with a different color zip tie on each cage to label as one hatchery or another. Rows are never mixed with each other, even when they go into winter storage they are put in different sections. A detailed daily log is kept for all farm operations. In this log we clearly differentiate which strain of seed we are working with. If cages need to be added to a row when the seed density grows, we add cages to that specific row to keep all the strains contained into their own homogenous rows.

For



12. Procedures for *maintaining records*:

For upwellers/seed-growing facilities in prohibited waters:

Description of procedures, including frequency of grading (with particular reference to requirements that seed must be removed before it exceeds maximum “seed” size threshold, i.e., <32 mm for oysters, <25 mm for quahogs):

No seed will be used from operations in prohibited waters.

13. Procedures for *maintaining records*:

For operations using seed from prohibited waters, or operations using shellfish obtained from a third party that originated as seed from prohibited waters:

Detailed description of demarcation methods and record-keeping practices used at the lease site to ensure that animals have been cultured at least six (6) months in approved waters, prior to sale, including:

- a. Detailed record-keeping practices specifying date, source, average size, and amount of seed; and
- b. Protocols and associated record keeping for tracking product, e.g., use of tagged/numbered cages and/or bags, use of marked trawls, and/or use of marked, segregated portions of lease sites.

Description of the process for notifying the third party that (a) seed came from prohibited waters, (b) the date of that transfer, and (c) the remaining time needed to maintain the animals in approved waters prior to sale.

No seed will be used from operations in prohibited waters.



LOCATION MAP

2/27/21

PROPOSED
AQUACULTURE LEASE
EXPANSION
MATT BEHAN



RECEIVED

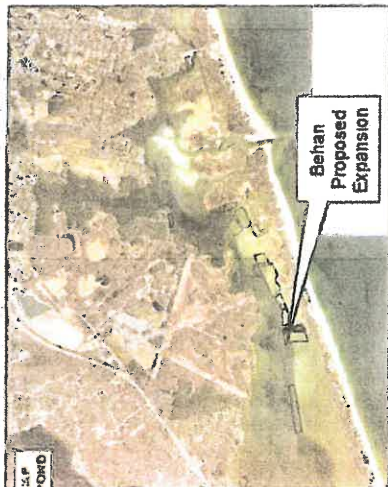
MAR 02 2021

COASTAL RESOURCES
MANAGEMENT COUNCIL



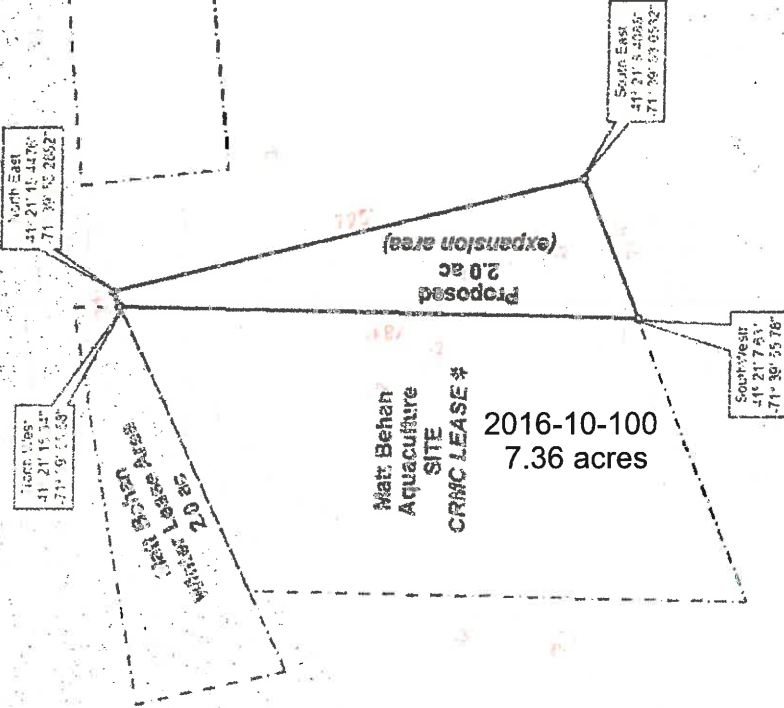
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SITE PLANS



2
28
21

PROPOSED
AQUACULTURE LEAS
EXPANSION
MATT BEHAN



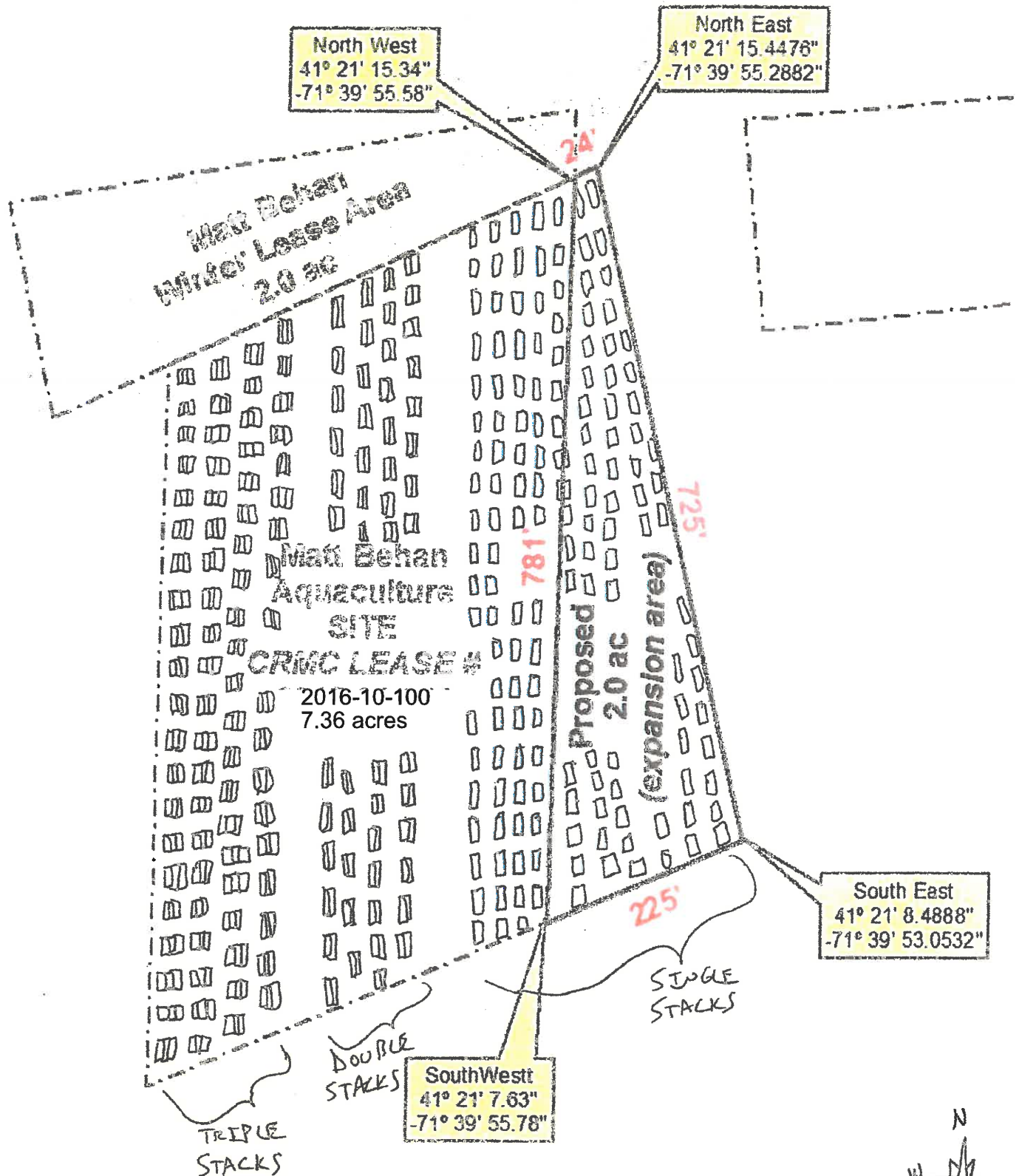
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MAR 11 2021
COASTAL RESOURCES
MANAGEMENT COUNCIL



1 FOOT CONTOURS (NAVD88)

GEAR LAYOUT

2/28/21

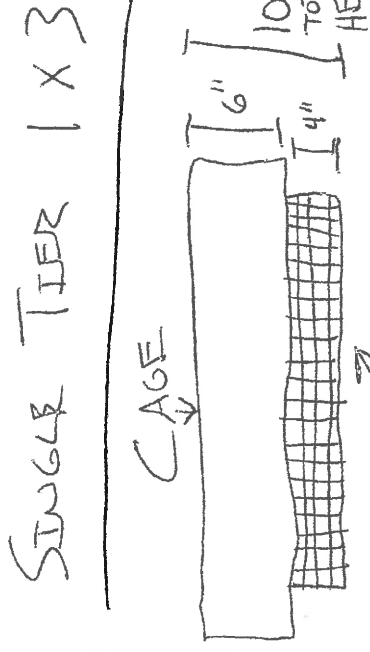
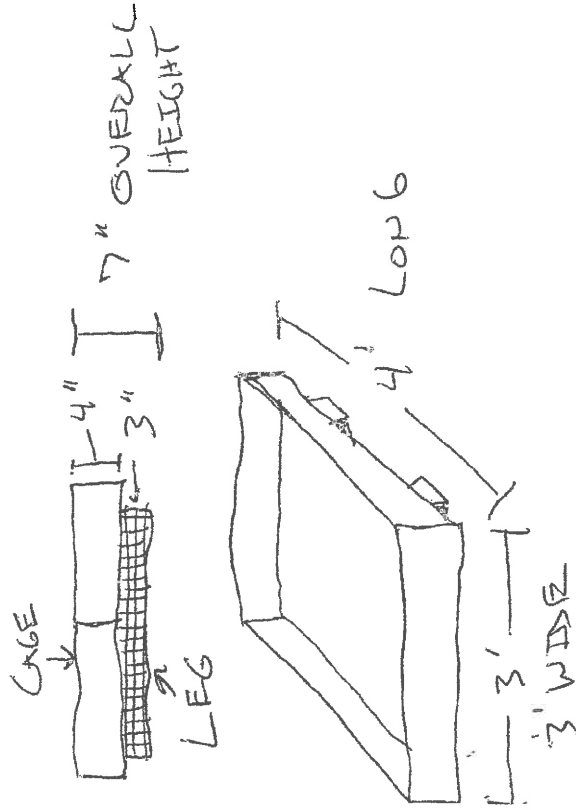


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MAR 11 2021
COASTAL RESOURCES
MANAGEMENT COUNCIL

ATTN: S. BEVAN
Norton Hill Rd
Swarthout, RI
2/25/21

GEAR DIAGRAMS

OPEN TOPS



RECEIVED
MAR 02 2021
COASTAL RESOURCES
MANAGEMENT COUNCIL

2/27/21

Cross Section View

- Mean Low Height 2'
- OVER 1' CLEARANCE
CAGE TO SURFACE



SINGLE TIER
"1 X 3"

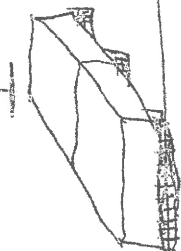
1' 2" ABOVE CAGE
TO SURFACE



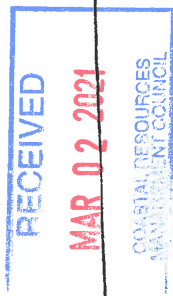
10" TOTAL
HEIGHT

OPEN TOPS

1' 5" ABOVE CAGE
TO SURFACE



7" TOTAL HEIGHT

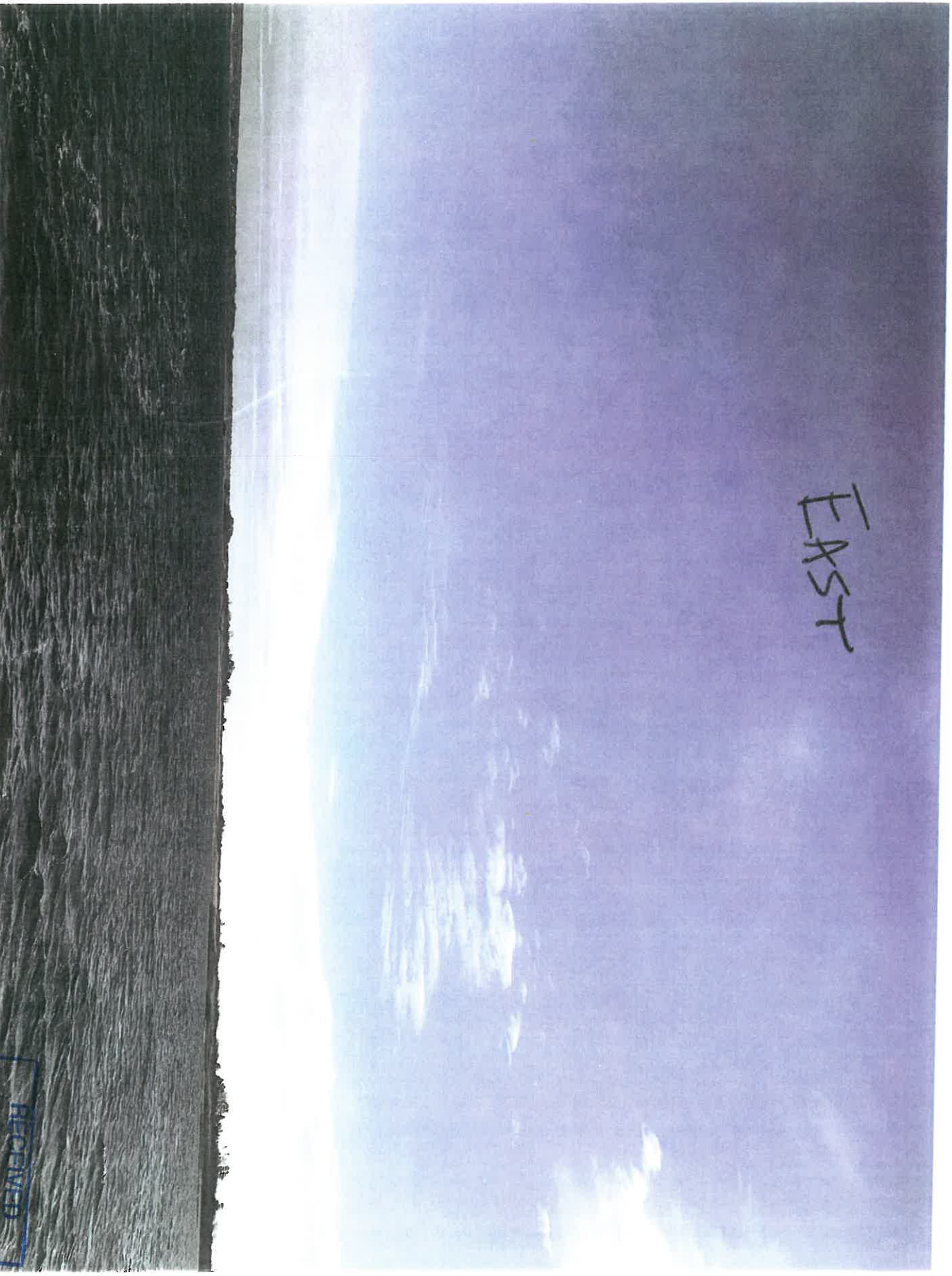


North



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EAST

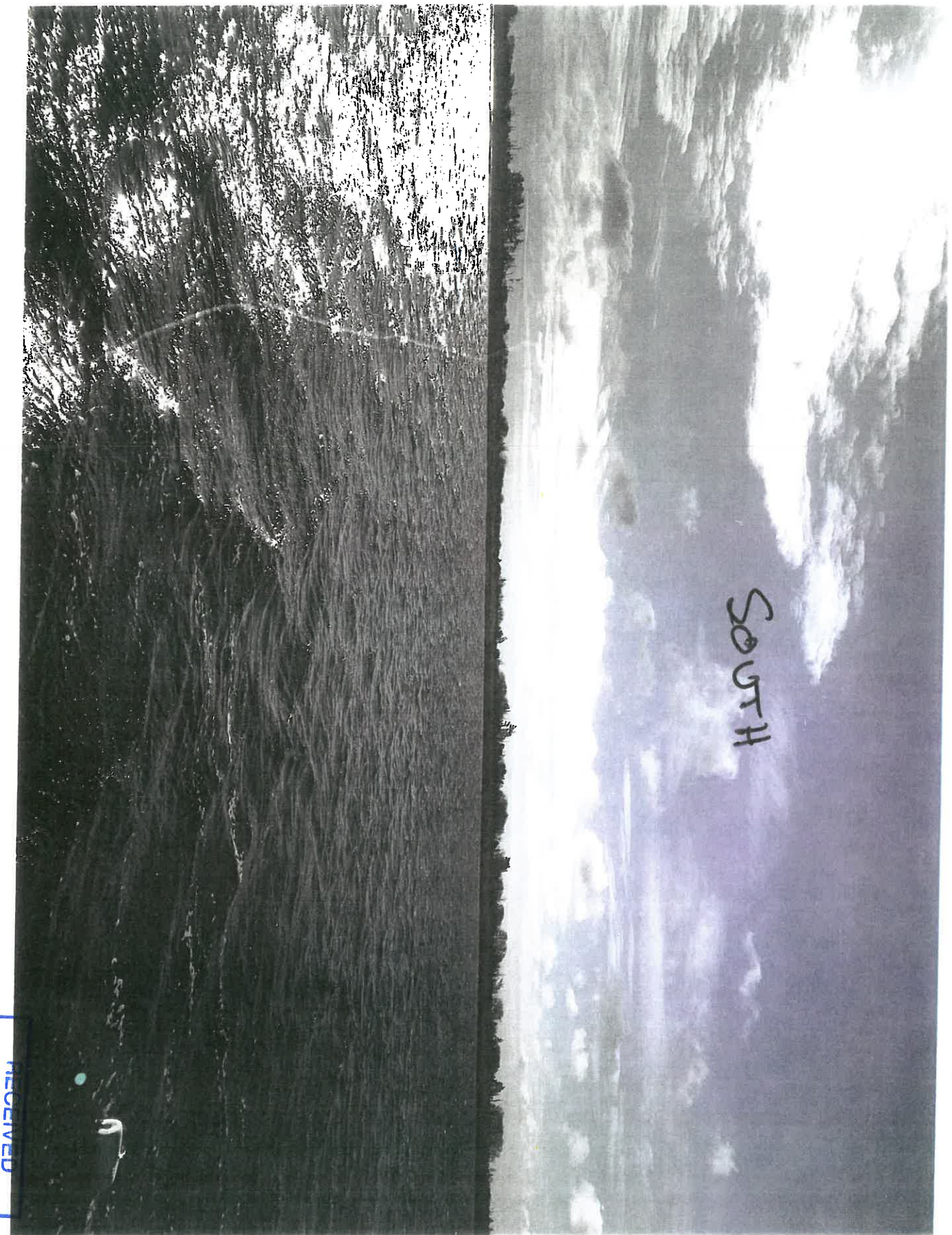


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SOUTH



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MANAGEMENT CONTINUED

WEST



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