

STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND AND WATER

PRELIMINARY DECISION

ADL 107861

James T. Greeley dba Tommaso Shellfish

Application for Lease Renewal

AS 38.05.083

This Preliminary Decision is the initial determination on a proposed disposal of interest in state land and is subject to comments received during the Public Notice period. The public is invited to comment on this Preliminary Decision. The deadline for commenting is **March 24, 2021**. Please see the Comments Section of this decision for details on how and where to send comments for consideration. Only the applicant and those who comment have the right to appeal the Final Finding and Decision.

Proposed Action:

The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW), Southcentral Regional Land Office (SCRO) has received a request from James T. Greeley dba Tommaso Shellfish (TS) to lease 3.73 acres, more or less, of state owned tide and submerged lands for 10 years for the purpose of culturing Pacific oysters (*Magallana gigas*) in an unnamed bay inside Shikat Point on the northern shore of Tuxekan Island, approximately 4 miles northwest of Naukati Bay, Alaska. The location of the project area is further described as being within the SE1/4 of Section 4, and SW1/4 of Section 3, Township 69 South, Range 79 East, Copper River Meridian, Alaska.

SCRO is considering the reissuance of an existing 10-year aquatic farmsite lease to TS consisting of a single parcel measuring 3.73 acres, more or less, containing 20 suspended culture grow-out rafts and a support facility raft to cultivate Pacific oysters.

Scope of Review:

The scope of this decision is to determine if it is the State's best interest to issue this aquatic farmsite lease renewal.

Authority:

This lease application is being adjudicated pursuant to AS 38.05.035 Delegation of the Powers and Duties of the Director; AS 38.05.070(b) Generally; AS 38.05.083 Aquatic Farming and Hatchery Site Leases; and AS 38.05.945 Public Notice. The authority to execute the Preliminary Decision, Final Finding and Decision, and the lease has been delegated to the Regional Manager of SCRO.

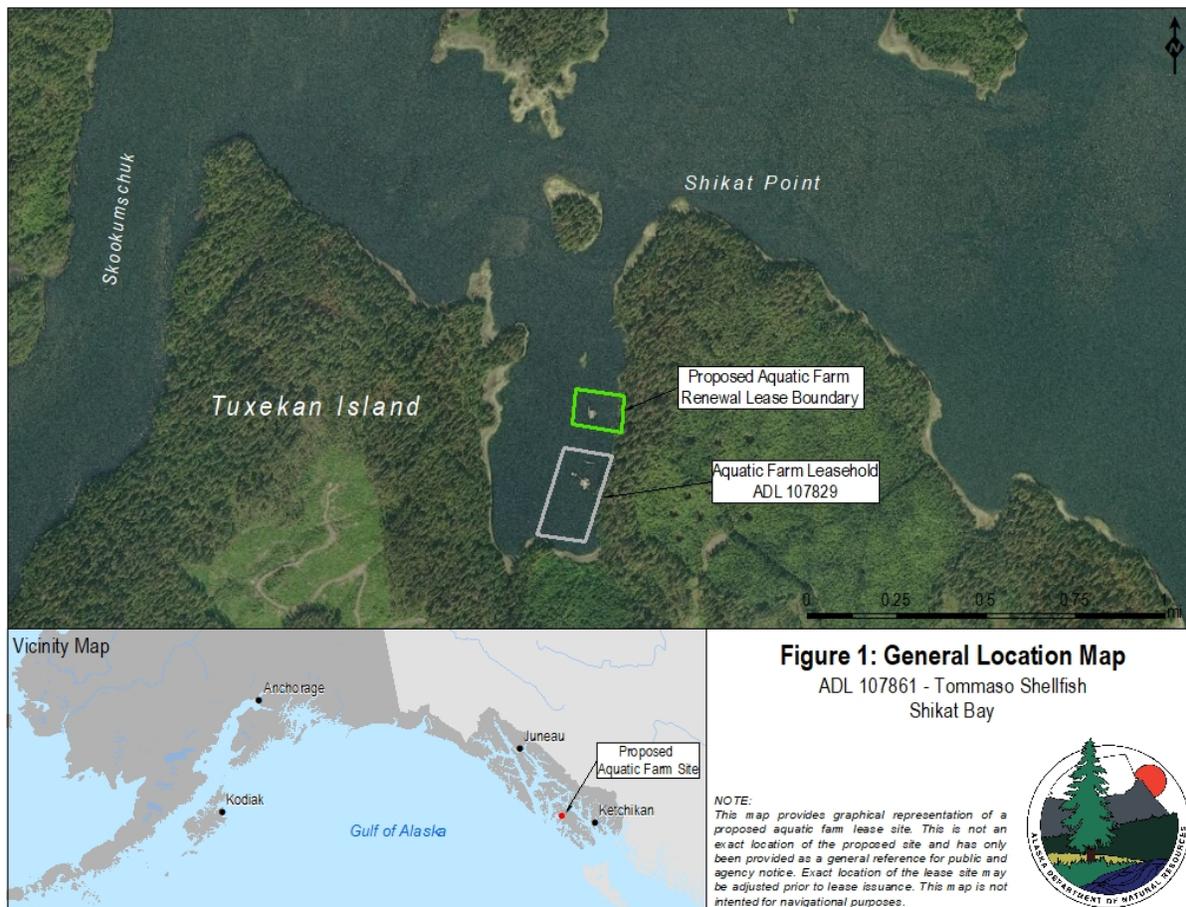
Administrative Record:

The administrative record for the proposed action consists of the Constitution of the State of Alaska, the Alaska Land Act as amended, applicable statutes and regulations referenced herein, the 1998 Prince of Wales Island Area Plan and other classification references described herein, and the casefile for the application serialized by DNR as ADL 107861.

Legal Description, Location, and Geographical Features:

The state land where this leasehold is located is described as follows:

- **Site reference name:** Shikat Bay
- **Legal description:** SE1/4 of Section 4, and SW1/4 of Section 3, Township 69 South, Range 79 East, Copper River Meridian, Alaska.
- **Geographical locations:** The farmsite is located in an unnamed bay inside Shikat Point on the north shore of Tuxekan Island, approximately 4 miles northwest of Naukati, Alaska. See Figure 1 for the project location.



- **Approximate Lat/Longs:**

Parcel #1: Suspended Grow-out Area: 395-feet by 405-feet by 400-feet by 411-feet = 3.73 acres, more or less

Northeast Corner 1: 55° 54.606' N, 133° 17.604' W
Southeast Corner 2: 55° 54.541' N, 133° 17.618' W
Southwest Corner 3: 55° 54.552' N, 133° 17.738' W
Northwest Corner 4: 55° 54.616' N, 133° 17.721' W

- **Existing surveys:** None
- **Municipality/Borough:** The leasehold is outside of an organized borough
- **Native Corporations/Federally Recognized Tribes:** Sealaska Corporation, Klawock Heenya Corporation, Klawock Cooperative Association

Title:

DNR Title Report (RPT-20955) issued on June 25, 2020 from DMLW's Realty Services Section, attests that the State of Alaska holds title to the subject tide and submerged lands under the Equal Footing Doctrine and the Submerged Lands Act of 1953.

Third Party Interests:

No third-party interests are known at this time.

Classification and Planning:

The leasehold location is subject to the POWIAP, Unit 7-Sea Otter Sound, Subunit: 7b-Tuxekan.

The POWIAP designates state owned tidelands in the Shikat Point area as Ra, Recreation (anchorage). The tideland designation for the leasehold location converts to the tideland classification of Public recreation land per Chapter 4. The nearest uplands to the leasehold are part of Tongass National Forest.

The management intent for aquatic farming outlined in Chapter 1 of the POWIAP recognizes the difficulty in specifically identifying areas deemed suitable for the siting of aquatic farms. Instead, the POWIAP seeks to minimize conflict with designated primary and upland uses, as well as to foster the development of an aquaculture infrastructure. To this end, it is recommended by the POWIAP that aquatic farm sites be concentrated in a few areas. POWIAP outlines 21 limited areas identified because of significant conflicts with anchorage, navigation, fish and wildlife habitat and harvest, or recreation where aquatic farming will be not be allowed. The leasehold is not located in one of these areas. Aquatic farming may be allowed in the rest of the planning area, providing it is consistent with all applicable local, state, and federal permitting requirements.

Per Chapter 2 of the POWIAP, the leasehold renewal must be in the overall best interest of the State before an authorization may be issued. Factors that are to be considered in this decision are identified in 11 AAC 63.050(b). Areawide land management policies described in Chapter 2 of the POWIAP state that the goals for aquatic farming are to provide opportunities to increase income and diversify the state's economy through the usage of state tidelands and submerged lands for aquatic farming. Further, following the management guidelines provided in Chapter 2, aquatic farming may be allowed on state tidelands or submerged lands as long as an aquatic farming operation is not incompatible with tideland or submerged lands "designated for log transfer or storage, mineral transfer or access, crucial fish and wildlife habitat, intensive storage areas adjacent to proposed land sales or existing residential areas, anchorages, or developed recreation".

According to Chapter 2 of the POWIAP, there are three management guidelines that provide a basis for the approval of proposed aquatic farm operations and the required public review process. Firstly, all aquatic farming operations must fulfill the requirements of all regulations and statutes at the local, state, and federal levels before a lease is issued. Secondly, DNR must take into consideration upland management intent as described by the Tongass National Forest (TNF) Land and Resource Management Plan (LRMP) when aquatic farm operations are sited adjacent to federal conservation units. Within the LRMP, the TNF uplands of the north shore of Tuxekan Island are within the Old-Growth Habitat Land Use Designation (LUD). Goals of the Old-Growth Habitat LUD include maintaining area of old-growth forests and their associated natural ecological processes to provide habitat for old-growth associated resources, and the management of early seral conifer stands to achieve old-growth forest characteristic structure and composition based upon site capability. The proposed leasehold does not pose a potential land use conflict with this management goal. Finally, DNR will allow aquatic farm operations in areas only where operation is compatible with, and does not inhibit access to, other uses in the immediate area and is consistent with the intent of the statute and with POWIAP.

Chapter 3 of the POWIAP describes the management intent and guidelines specific to Subunit 7b, and states that state tidelands and submerged lands will be managed for multiple use, including logging, recreation, fish and wildlife habitat and harvest areas. Sea Otter Sound marine waters are considered favorable for aquatic farming. Aquatic farming is an allowable use of state tidelands and submerged lands when in minimal conflict with primary designated use, and "should not preclude residential uses, including access, anchorage, and planned disposal of land". Where feasible and prudent, aquatic farming should locate in open water or in larger bays rather than in small, isolated coves. Chapter 3 identifies locations in the subunit where aquatic farming would conflict with existing recreation and community harvest usage, of which the leasehold location is not included.

In accordance with the POWIAP, aquatic farming is an allowable use given the relevant management guidelines, tideland designations, and existing uses of the immediate area, and is therefore consistent with the plan.

Traditional Use Findings

The proposed lease is not located within an organized borough. AS 38.05.830 and 11 AAC 63.050(b)(5)(B) require consideration of whether the lease site impacts traditional and existing uses of the site. The proposed leasehold falls within the ADF&G Game Management Unit (GMU) 2 and the Southeast Alaska Region for commercial fisheries. ADF&G hunting regulations list black bear, deer, wolf, and wolverine as species that can be hunted. Trapping regulations for GMU 2 list beaver, coyote, red fox, lynx, marten, and several other furbearers. The proposed lease site is located within the Southeast Alaska/Yakutat subsistence fishing area. ADF&G regulations for the Southeast personal use fishery state salmon, herring, groundfish, king crab, tanner crab, Dungeness crab, shrimp, and scallops can all be harvested.

Salmon are harvested in the Southeast Alaska commercial fishery with purse seines, drift gillnets, and with hand and power troll gear. Herring are harvested in winter bait, sac roe, spawn-on-kelp, and bait pound fisheries. Commercially important shellfish species in the region include golden and red king crab, Dungeness crab, Tanner crab, and pandalid shrimp. Miscellaneous shellfish such as sea cucumber, sea urchins, and geoduck clams are harvested in dive fisheries in the region. ADF&G has management jurisdiction over all groundfish resources within state waters as well as management authority for Demersal Shelf Rockfish, ling cod, and black and blue rock fish in both state and federal waters.

The proposed lease is within the Prince of Wales Management Area for sport fisheries. Most sport fishing effort in marine waters usually occurs from late May through early September for chinook salmon, Coho salmon, and halibut. The majority of the chinook and halibut effort and catch occurs on the west coast of Prince of Wales Island. Many anglers target the "fall run" Coho that usually begin entering freshwater streams in late August and peak in September. However, a few island streams contain runs of "summer run" Coho and these fish can be found in fresh water as early as late June. The largest Coho return in the area is to the Klawock River. The Klawock River Hatchery releases millions of Coho smolt annually, and the best time to fish for Klawock Coho is from late August through September. Almost all streams on Prince of Wales Island that contain anadromous salmon have a Coho run. The best months for Steelhead fishing on the island are April and May, but a few fall run fish can be found throughout the winter in some of the larger streams.

The Southeast Alaska/Yakutat subsistence fishery area species include salmon, halibut, herring spawn-on-kelp, shellfish and groundfish. In addition, eulachon, Dolly Varden, trout, and smelt are all taken for subsistence purposes. Depending on the area, salmon can be harvested with set gillnets, drift gillnets, gaffs, spears, beach seines, dip nets, cast nets and hand purse seines. The permit issued for each area specifies the allowable types of gear. Shellfish species taken for subsistence include Dungeness crab, king and tanner crab, shrimp, abalone, geoducks, and scallops. Groundfish species that can be harvested in the subsistence fishery include sablefish, Pacific cod, lingcod, flatfish, walleye Pollock, skates, and all species of rockfish.

The siting of the proposed aquatic farm should not interfere with traditional and/or existing uses of the area, including commercial or sport fishing, subsistence activities, boat travel, and recreation. Public and Agency Notice may reveal more unknown uses. If such information becomes available, any potential or existing conflicts will be addressed in a final best interest finding.

Access:

Access to the aquatic farm is by boat or floatplane from Naukati, Alaska.

Access To and Along Navigable and Public Waters:

Nearly all shore and tidelands in the State of Alaska are subject to a To and Along Easement under AS 38.05.127 and 11 AAC 51.045. The purpose of this easement is to uphold the constitutional right of the public to have free access to, and use of, the state's waterways. At the proposed lease site, the Along easement is 50 feet seaward from the line of mean high water (MHW).

Public Trust Doctrine:

Pursuant to AS 38.05.126 all authorizations for this site will be subject to the principles of the Public Trust Doctrine; specifically, the right of the public to use navigable waterways and the land beneath them for: navigation, commerce, fishing, hunting, protection of areas for ecological studies, and other purposes. These rights must be protected to the maximum extent practicable while allowing for the development of this project. As such, SCRO is reserving the right to grant other authorizations to the subject area consistent with the Public Trust Doctrine.

Lease Discussion:

TS submitted an aquatic farm application on April 28, 2009 and was issued a 10-year aquatic farm lease on March 1, 2010 with an expiration date of February 29, 2020. The leasehold was found to be in good standing during two field inspections DNR completed on June 25, 2015 and June 7, 2018. An application for reissuance was received on February 27, 2020.

The renewal application requests one parcel to be used as a suspended grow-out area measuring 3.73 acres, more or less. The operation will cultivate and harvest Pacific oysters. The parcel will hold 20, 16-foot by 20-foot grow-out rafts constructed of untreated local lumber. Each grow-out raft will have 20 cross pieces measuring 2 feet by 8 feet secured along the length of the raft for hanging 336 grow-out trays, stacked eight high. Each tray measures 22 inches wide by 22 inches long by 6 inches deep and is constructed using 1-inch square mesh. Stacks of grow-out trays will hang between 3 feet and 10 feet under the surface of the water. All grow-out rafts will be secured together in two sets of lines, with up to ten grow-out rafts in each line. The two sets of grow-out rafts will be secured with five concrete anchors, each weighing between 200 and 300 pounds. Both ends of each set of grow-out rafts will be marked with a 24-inch buoy.

A 50-foot by 40-foot support facility raft constructed with untreated wood and spruce logs will be located on the south side of the parcel. The support facility raft will contain sorting trays, workbenches, and a wing-arm electric hoist that will be used for to lift the stacks of trays from the grow-out rafts. The support facility raft is anchored with two gabion basket 1,000-pound anchors filled with rocks, one 300-pound concrete anchor, and one 250-pound iron Danforth type anchor.

Harvested oysters will be cleaned and boxed for market on the processing facility raft. The facility raft and grow-out rafts will stay onsite year-round. Suspended oyster trays will be onsite spring through fall and removed when the oysters are harvested. Gear and equipment not in use will be stored in Whale Pass on private property.

At this time the commercial use requirement (CUR) states a farm needs to be making annual sales in excess of \$3,000.00 per acre or \$15,000.00 per farm by the fifth year of operation of aquatic farm product. Failure to meet CUR constitutes a default and may be cause for termination. Annual reports of sales are due January 31 of every year.

TS met the CUR on in 2014, 2018, and 2019. CUR was not met in 2015 through 2017 due to issues with sourcing oyster spat and weather. The annual reporting requirement has been met every year the lease was valid. The proposed lease will be subject to the terms of DMLW's standard lease document and any Additional Stipulations based, in part, upon the following considerations.

Operation and Development Plan:

The Operation and Development Plan dated April 15, 2020 is accepted by SCRO as complete but may be subject to change based on agency and public review. Should the leasehold renewal be granted, it is anticipated that the Development Plan will need to be updated throughout the life of the lease as activities and/or infrastructure are added or subtracted. All updates must be approved, in writing, by SCRO before any construction, deconstruction, replacement of infrastructure, or change in activity will be permitted. SCRO reserves the right to require additional agency review and/or public notice for changes that are deemed by SCRO to be beyond the scope of this decision.

Hazardous Materials and Potential Contaminants:

No hazardous materials or fuel will be stored on the proposed lease. The use and storage of all hazardous substances must be done in accordance with existing federal, state and local laws. Debris (such as soil) contaminated with used motor oil, solvents, or other chemicals may be classified as a hazardous substance and must be removed from the sites and managed and disposed of in accordance with state and federal law.

Lease Performance Guaranty (bonding):

In accordance with AS 38.05.083(e) and 11 AAC 63.080, TS has submitted a performance guaranty "sufficient to cover the cost of the site cleanup and restoration and any associated clean cost after termination of lease, including any unpaid rentals or other obligations until site

restoration is complete, [or] is the lessee abandons site” after lease termination or if the lessee abandons the site.

- **\$2,500.00 Performance Bond:** This \$2,500.00 bond, submitted by TS on May 16, 2010, will remain in place for the life the lease. The bond amount is based upon the level of development, amounts of hazardous material/substances on site, and the perceived liability to the state. This bond will be used to insure the applicant’s compliance with the terms and conditions of the lease issued for their project. This bond amount will be subject to periodic adjustments and may be adjusted upon approval of any amendments, assignments, re-appraisals, changes in the development plan, changes in the activities conducted, or changes in the performance of operations conducted on the authorized premises, and as a result of any violations to one or more of the authorizations associated with this project.
- **Reclamation Bond:** SCRO is reserving the right to require a reclamation bond due to non-compliance issues during the term of the lease or near the end of the life of the project.

Insurance:

TS will be required to submit proof of liability insurance to SCRO, with the State of Alaska listed as a “NAMED” insured party. TS will be responsible for maintaining such insurance throughout the term of the lease.

Survey:

In accordance with AS 38.04.045, this short-term lease does not require a survey. However, the State of Alaska reserves the right to require one in the future, should the need arise due to changes in statutes or increased use of the area. TS has submitted GPS coordinate points for the four corners of the proposed leasehold.

Compensation and Appraisal:

DMLW has approved an administrative lease fee schedule for aquatic farmsites that meet the conditions listed within the schedule. The most current lease fee schedule will be used to establish the fair market rental each lessee must pay. Fees are subject to adjustment per AS 38.05.083(c). The current annual rate for a 3.73-acre aquatic farm lease is a base fee of \$450.00 for the first acre and \$125.00 for each additional or partial acre. In accordance with the Aquatic Farmsite Fee Schedule, Report No. 2522-14, a breakdown of the lease fee will be as follows:

$$3.73 \text{ acres (1 acre at } \$450) + (3 \times \$125) = \$825.00 \text{ per year}$$

If the applicant does not agree with the fee schedule amount of \$825.00, a fair market value determination can be obtained by the applicant. Fair market value is determined by obtaining a

DNR approved appraisal of the lease site. If an appraisal is conducted to determine fair market value of the lease site, the applicant will be required to pay the appraised amount and the \$825.00 annual fee will no longer be an option. The appraisal cost will be borne by the applicant. The parcel may need to have an approved Alaska Tidelands Survey to accomplish the appraisal. If a survey is required, the cost will be incurred by the applicant.

Assignment of Lease:

The proposed lease, if issued, may be transferred or assigned to another individual or corporation **only** with prior written approval from the DMLW. A lease will not be assigned to an entity if that entity does not meet the statutory requirements of the lease or the lease is not in good standing. DMLW reserves the right to amend the terms of the lease prior to assignment.

Reclamation:

In accordance with AS 38.05.090(b), all Lessees must restore their lease sites to a “good and marketable condition” within 120 days after termination of the lease. What level of reclamation constitutes as being “good and marketable” is at the discretion of SCRO. DNR reserves the right to require a reclamation bond at any time.

Agency Notice:

An Agency Review will be conducted and run concurrently with the Public Notice for a 30-day review starting on February 23, 2021. The deadline for agency comments is March 24, 2021.

The following agencies will be included in the review:

- DNR DMLW – Mining
- DNR DMLW – Water
- DNR DMLW – Resource Assessment and Development
- DNR DMLW – Reality Services
- DNR Southeast Land Office
- DNR DPOR Office of History and Archaeology, State Historic Preservation Office
- DNR Natural Resource Conservation and Development Board
- DNR Division of Oil and Gas
- ADF&G – Aquatic Farm Coordinator
- Alaska Department of Environmental Conservation
- Alaska Department of Transportation and Public Facilities
- U.S. Forest Service
- U.S. Army Corp of Engineers
- U.S. Fish and Wildlife Service
- National Oceanic and Atmospheric Administration
- U.S. Environmental Protection Agency
- U.S. Coast Guard

- Alaska Department of Commerce, Community, and Economic Development
- Alaska Association of Conservation Districts
- Alaska Department of Public Safety
- Alaska State Troopers Wildlife Division
- Alaska Mental Health Trust Land Office
- Southeast Soil and Water Conservation District

Public Notice of the Preliminary Decision:

Pursuant to AS 38.05.945, this PD will be advertised for 30-day public comment period. Notice will be posted on the Alaska Online Public Notice System at and the post offices located in Coffman Cove, Edna Bay, Klawock, and Naukati Bay. Courtesy notices will also be mailed or emailed to neighboring property owners, permit/lease holders, and other interested parties on February 23, 2021 for a 30-day public comment period.

Comment(s):

This decision is subject to both public and agency comments and all comments received by the comment deadline will be considered in the Final Finding and Decision. Only those who comment and the applicant have the right to appeal the Final Finding and Decision.

Written comments about this project must be received in this office no later than 5:00 PM on March 24, 2021 to be considered.

To submit comments, please choose one of the following methods:

Postal: Department of Natural Resources
Southcentral Regional Land Office
ATTN: Kate Lusby
550 West 7th Avenue Suite 900C
Anchorage, AK 99501-3577

Phone: 907-269-8618

E-mail: kate.lusby@alaska.gov

Fax: 907-269-8913

If public comments result in significant changes to the Preliminary Decision, additional public notice may be given. To be eligible to appeal the Final Finding and Decision, a person must provide written comments during the Preliminary Decision comment period per AS 38.05.035(i)-(m).

Signature Page Follows

Recommendation:

DMLW has completed a review of the information provided by the applicant, examined the relevant land management documents, and has found that this project is consistent with all applicable statutes and regulations. SCRO considered three criteria to determine if this project provided the best interest to the State and the development and enjoyment of its natural resources. The criteria include direct economic benefit to the State, indirect economic benefit to the State, and encouragement of the development of the State’s resources. This authorization provides a direct economic benefit to the State with the collection of one-time filing fees and any yearly rent/fees. The authorization of this lease is in the State’s best interest as it furthers economic development of the State’s aquatic farm industry. It is recommended that SCRO issue a 10-year lease to James T. Greeley dba Tommaso Shellfish.

Kate Lusby 12/3/2020

Kate Lusby, Natural Resource Specialist II Date

Preliminary Decision:

It is the determination of the Division of Mining, Land, and Water that it may be in the State’s best interest to issue an aquatic farmsite lease to James T. Greeley dba Tommaso Shellfish, as described above. Upon authorization of lease ADL 107861, the applicant will be required to pay the annual lease fee of \$825.00, maintain the \$2,500.00 performance bond, and provide proof of liability insurance. This Preliminary Decision shall now proceed to agency and public notice.

Samantha Carroll 2/7/2021

Samantha Carroll, Regional Manager Date
Southcentral Regional Land Office
Division of Mining, Land & Water

Attachments

Attachment A – Development Plan: General Location Map, Site Plan Maps, Project Description, and Operation and Development Plan (The complete Development Plan is available upon request.)



Attachment A

Development Plan

PROJECT DESCRIPTION
TOMMASO SHELLFISH FARM – SHIKAT BAY
JAMES GREELEY
4/15/2020

1. **Site location**

The farm site is located in an unnamed bay inside Shikat Point on the northern shore of Tuxekan Island, approximately 4 miles northwest of Naukatu, Alaska, in Southeast Alaska on state-owned land.

2. **Site dimensions, acres for each parcel and total acres**

The aquatic farm site is composed of one (1) parcel measuring 395 ft x 405 ft x 400 ft x 411 ft, totaling about 3.73 acres.

3. **Species you intend to farm**

The operation will culture of Pacific oysters, *Magallana gigas*.

4. **Culture Method**

Pacific oyster seed will be obtained from an approved seed provider. Suspended grow-out rafts and cage system will be used to culture of Pacific oysters. Trays with oysters will be suspended under the surface of the rafts and brought up by a battery powered pulley and sorted, cleaned using a power washer, and culled to decrease the density and placed into trays and back into the water throughout the growing season (spring through fall). Monitoring and maintenance of stock and gear and equipment will be done throughout the year.

5. **Gear and Equipment (type, size, number, configuration, material, mesh size, and anchoring system)**

Parcel 1 will hold twenty (20) 16 feet by 20 feet oyster grow out rafts. Each oyster grow-out raft will have 20 cross pieces, or fingers, measuring 2 ft x 8 ft secured along the length of the raft to be used for hanging 336 grow out trays stacked 8-high. Each grow-out raft will use 100-300 Aquamesh cages stacked 10 high. Each tray measures 22" wide x 22" long x 6" deep and is constructed using 1" square mesh. The five ft stacks of trays will hang between 3 ft and 10 ft under the water's surface.

Grow out rafts will be secured together in two sets of lines up to 10 rafts each set. The oyster grow-out rafts will be attached at the corners to 1 ¼" polyline and secured using up to 5 - 200 to 300 lb concrete anchors, anchor chain, anchor line, and marked with a 24" buoy. Once in full production with two lines of rafts there will only be approx. 5 anchoring systems. All grow-out rafts are constructed of untreated local wood with flotation made of shrink-wrapped Styrofoam or plastic 55 gallon drums.

Grow-out raft sets will be 50 feet apart. Grow-out rafts will be in water year-round.

6. **Harvest equipment and method**

A wing-arm electric hoist from support facility raft will be used to lift the stacks of trays. The oysters will be cleaned and boxed for market in the processing facility.

7. **Support Facilities (type, size, number, configuration, material, and anchoring)**

A support processing facility raft will be used measuring 50 feet by 40 feet for storing gear and processing oysters with refrigeration. The support processing facility sits on the South side of the parcel. The south portion of support facility raft has a covered roof for storing trays and workbenches for cleaning, etc. The support facility raft is constructed with untreated wood with flotation made of spruce logs. Support facility raft will be onsite year-round.

The support facility raft is anchored with four anchors: two gabion basket 1000 lb each filled with rock in 10 ft deep at mean low water, 1 concrete anchor 300 lb 60 ft deep, and one iron Danforth type anchor 250 lb. 60 ft deep.

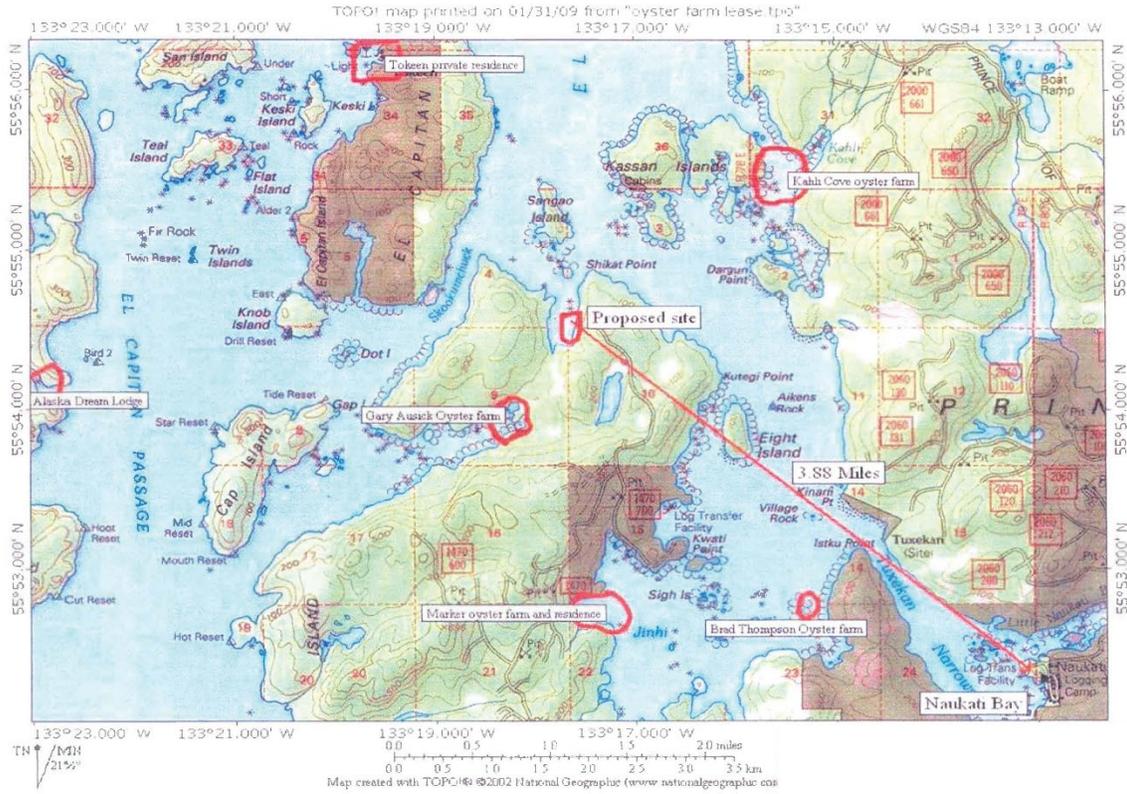
8. **Access to and from site**

Access to the site is by boat or floatplane from Naukati.

9. **Storage location of equipment and gear when not in use**

Storage of gear and equipment will be stored in Whale Pass on private property when not in use.

Figure 1: General Location Map



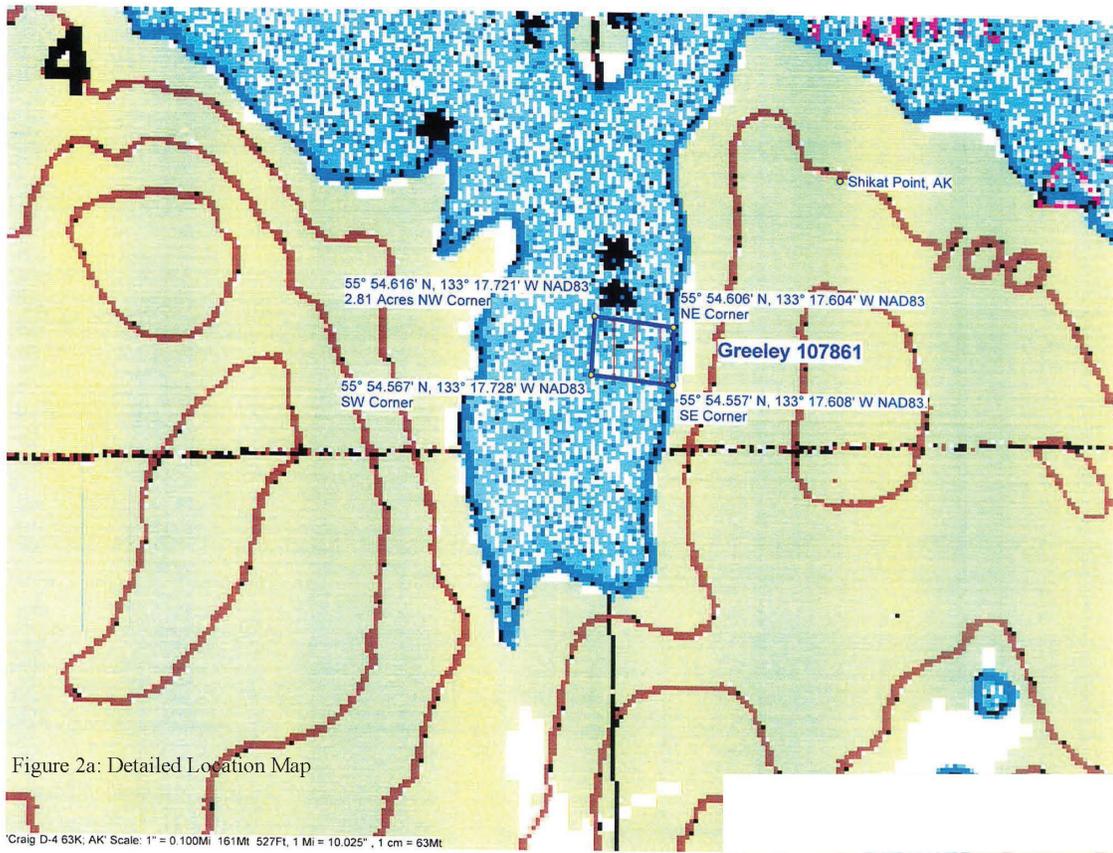
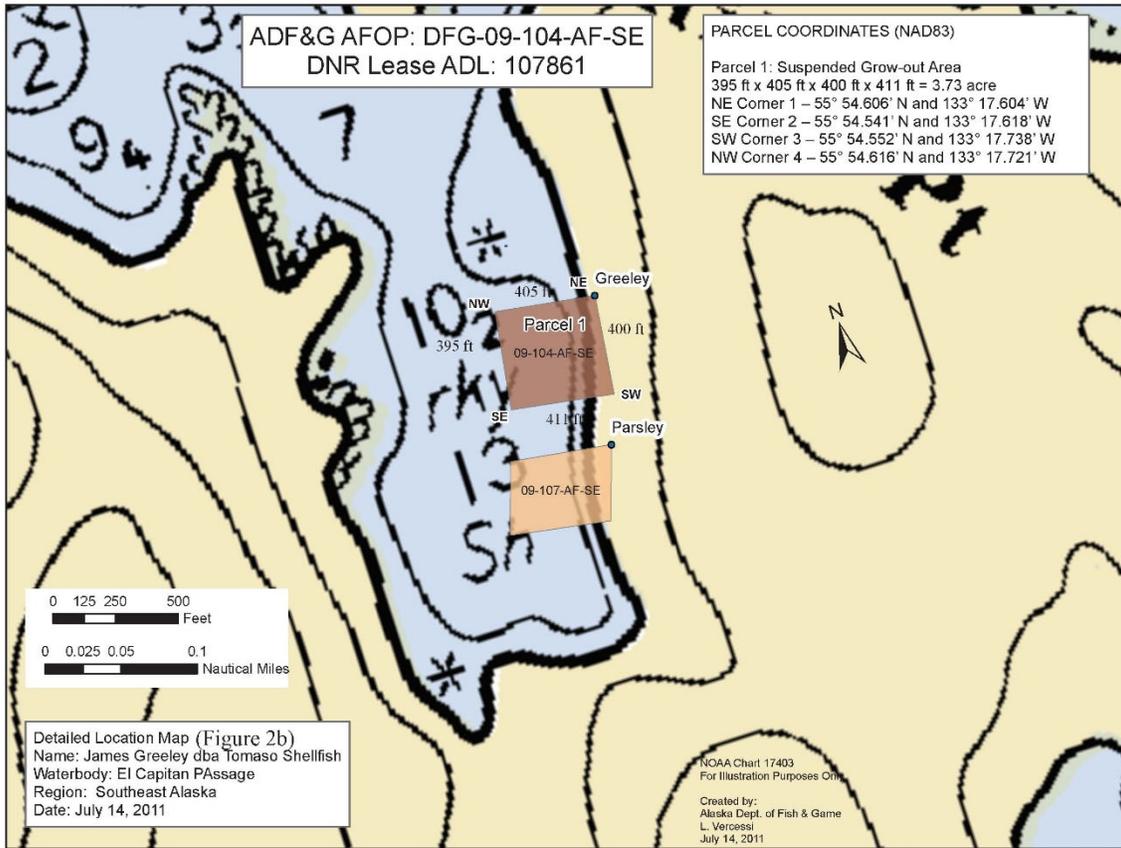
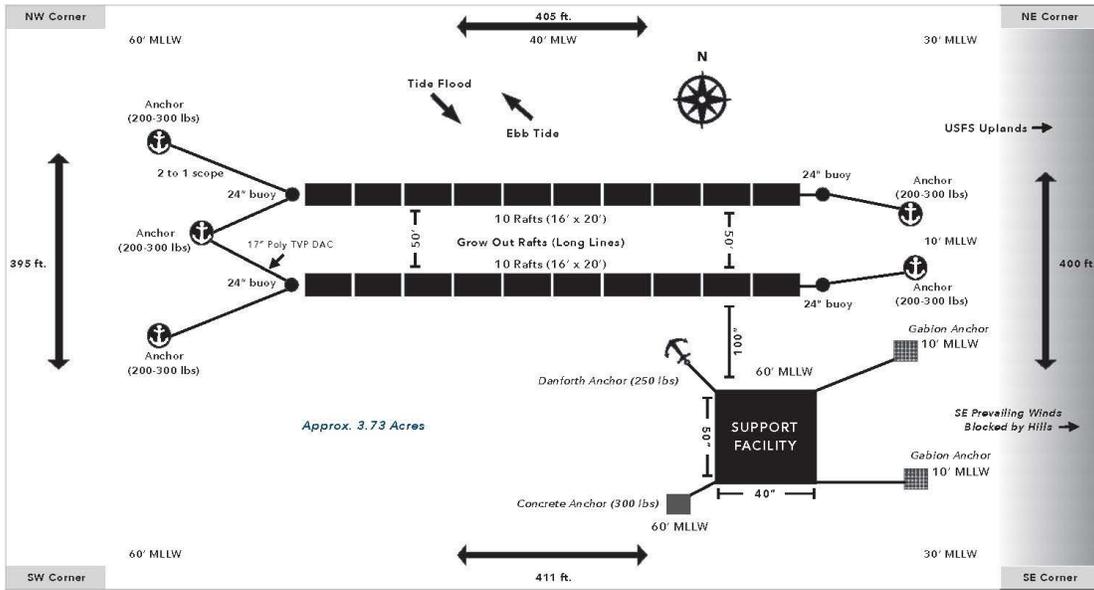


Figure 2a: Detailed Location Map

Craig D-4 63K, AK Scale: 1" = 0.100Mi 161Mt 527Ft, 1 Mi = 10.025", 1 cm = 63Mt



Tommaso Shellfish Site Diagrams (James Greeley)

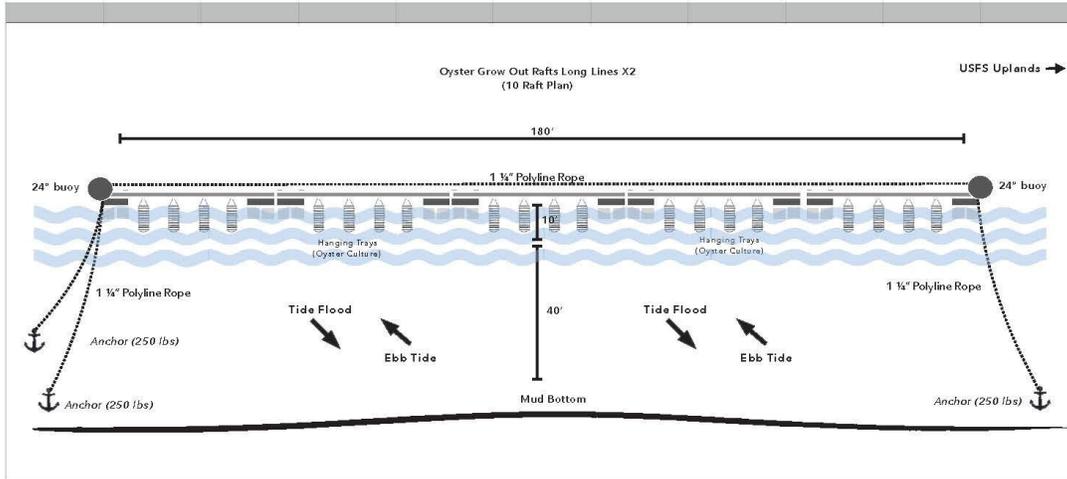


Site Plan Map Figure 3
 Tommaso Shellfish
 Shikot Bay
 Sea Otter Sound, Prince of Wales Island, Southeast AK
 April 16th, 2020

Key: For support facility anchoring - 2 Gabion Baskets w/ rocks (1000 lbs) & 1 Iron Grader (500 lbs)

** Not to scale

Tommaso Shellfish Site Diagrams (James Greeley)

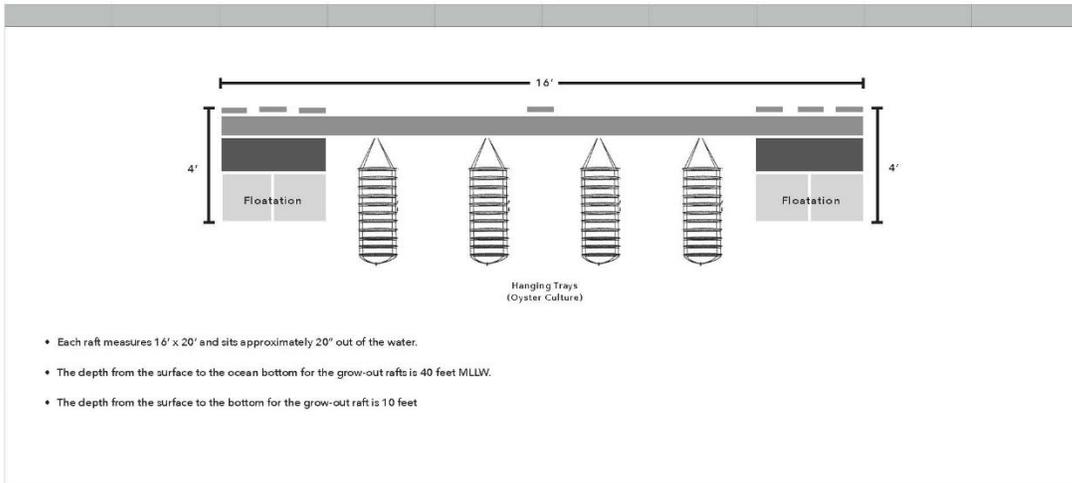


Oyster Grow Out Raft Long Lines (Cross-Sectional Diagram)
Tommaso Shellfish
Shikot Bay
Sea Otter Sound, Prince of Wales Island, Southeast AK
April 16th, 2020

Figure 5a

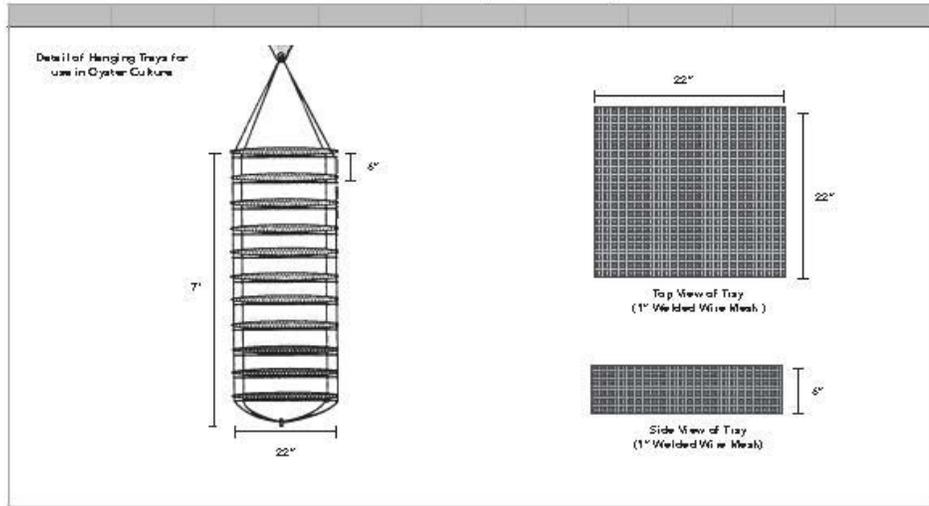
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Tommaso Shellfish Site Diagrams (James Greeley)



Oyster Grow Out Raft (Cross-Sectional Diagram) Figure 5c
Tommaso Shellfish
Shikat Bay
Sea Otter Sound, Prince of Wales Island, Southeast AK
April 16th, 2020

** Not to scale



Oyster Culture Trays (Cross-Sectional Diagram) Figure 5d
Tommaso Shellfish
Sitka Bay
Sea Otter Sound, Prince of Wales Island, Southeast AK
April 16th, 2020

** Not to scale

Figure 5e

TOMMASO SHELLFISH PROCESSOR ROOM

