

**STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF COMPLIANCE & INSPECTION**

IN RE: Sharon Drive LLC

FILE NO.: OCI-FW-16-166

NOTICE OF VIOLATION

A. INTRODUCTION

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Rhode Island Department of Environmental Management (“Director” of “RIDEM”) has reasonable grounds to believe that the above-named party (“Respondent”) has violated certain statutes and/or administrative regulations under RIDEM's jurisdiction.

B. ADMINISTRATIVE HISTORY

On 24 September 2020, RIDEM issued a Notice of Intent to Enforce (“NIE”) to Respondent by certified mail for the violations that are the subject of this Notice of Violation (“NOV”). The NIE advised Respondent of the specific actions required to correct the violations. On 3 October 2020, the NIE was delivered. RIDEM did not receive a response to the NIE. The Coventry online tax assessor’s database identifies the mailing address of Respondent as 65 Island Drive, Coventry, Rhode Island and the owner of 65 Island Drive, Coventry, Rhode Island as Ernest G. Pullano Trust (“Trust”). On 2 August 2022, RIDEM issued a letter to the Trust by certified mail. The letter included a copy of the NIE and advised the Trust that RIDEM had not received a response to the NIE and that Respondent had failed to comply with the NIE. On 6 August 2022, the letter was delivered. As of the date of the NOV, RIDEM has not received a response to the NIE from either Respondent or the Trust and Respondent has not complied with the NIE.

C. FACTS

- (1) The property is located between 10 feet and 200 feet west of Sharon Drive, approximately 1,250 feet north/northeast of the intersection of Sharon Drive and Marion Drive, Assessor’s Plat 42, Lot 24 in Coventry, Rhode Island (“Property”).
- (2) Respondent owns the Property. Respondent acquired the Property on 10 June 2016.
- (3) On 14 October 2016, RIDEM received a complaint regarding cutting of trees and filling in wetlands on the Property.
- (4) On 2 November 2016, RIDEM inspected the Property. The inspection revealed alterations to freshwater wetlands.

- (5) On 26 May 2020, RIDEM received a complaint regarding building a stone wall in wetlands on the Property.
- (6) On 28 May 2020 and 17 June 2020, RIDEM inspected the Property. The inspection revealed further alterations to freshwater wetlands.
- (7) On 18 August 2021, RIDEM inspected the Property. The inspection revealed the same conditions that were present in the 17 June 2020 inspection.
- (8) On 25 July 2022, RIDEM received a complaint that restated the concerns noted in the prior complaints on the Property that were filed with RIDEM.
- (9) The inspections on 2 November 2016, 28 May 2020, 17 June 2020, and 18 August 2021 revealed the following:
 - (a) Filling (in the form of soil material and components of shoreline improvements) and grading within a Pond to construct a retaining wall, boat ramp, and dock, as well as to create and maintain a lawn; and clearing, stumping, filling (in the form of at least soil material), grading, and creating surface disturbance within a fringe Swamp associated with the Pond. These activities have resulted in the unauthorized alteration of approximately 4,250 square feet of freshwater wetland.
 - (b) Clearing, stumping, filling (in the form of at least soil material), grading, creating surface disturbance, establishing, and maintaining lawn, and maintaining an access driveway within Perimeter Wetland. This activity has resulted in the unauthorized alteration of approximately 11,000 square feet of freshwater wetland.
- (10) The activities described in subsection C (9) above were not exempt in accordance with Part 3.6 (formerly Part 1.6) of Rhode Island's *Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act* (250-RICR-150-15-3) (formerly 250-RICR-150-15-1) ("FWW Rules").
- (11) Respondent did not receive a permit from RIDEM to alter the freshwater wetlands on the Property in the areas described in subsection C (9) above.
- (12) As of the date of the NOV, Respondent has not fully restored the freshwater wetlands in the areas described in subsection C (9) above.

D. VIOLATION

Based on the foregoing facts, the Director has reasonable grounds to believe that you have violated the following statutes and/or regulations:

- (1) **R.I. Gen. Laws Section 2-1-21** – prohibiting activities which may alter freshwater wetlands without a permit from RIDEM.
- (2) **FWW Rules, Part 3.5.5(A) (formerly Part 1.5(A)(1))** – prohibiting activities which may alter freshwater wetlands without a permit from RIDEM.

E. ORDER

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), you are hereby ORDERED to:

- (1) **IMMEDIATELY** cease and desist from any further alteration of the above-described freshwater wetlands.
- (2) Restore all freshwater wetlands in accordance with the restoration requirements set forth below.

RESTORATION REQUIREMENTS

- (a) Prior to the commencement of restoration, install a continuous uninterrupted line of staked-in compost filter socks, coir or coconut-fiber logs, straw wattles, haybales, and/or other biodegradable soil erosion/sediment (“SES”) controls between those portions of the freshwater wetlands that have been altered and any adjacent undisturbed freshwater wetland features (i.e., between the limits of the unauthorized retaining wall and the adjacent undisturbed portions of the Pond). If a significant depth of surface water is present in the Pond immediately adjacent to the unauthorized retaining wall at the time of restoration work (see below), then a weighted silt curtain must be properly installed outside of (along) the entire northern and western sides of the retaining wall, to prevent the transport of suspended sediments into adjacent undisturbed portions of the Pond. These SES controls must be regularly inspected and properly and continually maintained (and replaced, if necessary) during and following the completion of the required wetland restoration, and until such time that all the surrounding areas are properly stabilized. At the discretion and direction of RIDEM, additional SES controls must be installed on-site, as deemed necessary, to protect all freshwater wetlands.

- (b) Remove all unauthorized fill material (including but not limited to soil material and all components of the retaining wall, boat ramp, and dock) from the Pond. Prior to removal of fill material, proper SES controls must be installed as described in subsection E(2)(a) above. All fill material must be removed down to the grade of the original Pond bottom, matching the bottom elevations of the adjacent undisturbed portions of the Pond. All unauthorized fill material must be deposited in an appropriate upland location, outside of all freshwater wetlands. **All work within the Pond must be undertaken during the normal Pond water drawn-down period or during an otherwise acceptable “low-flow” period (generally July 1 - October 31), during which surface water in the Pond is sufficiently low to allow for the required restoration.**
- (c) Remove all unauthorized fill material (including but not limited to all soil fill material and all components of the wall and other site improvements) from the Swamp and Perimeter Wetland. All removed fill material must be deposited in an appropriate upland location, outside of all freshwater wetlands.
- (d) Following fill removal, as applicable, all disturbed surface areas within the Swamp must be seeded with an appropriate wetland seed mixture. Any disturbed areas within Perimeter Wetland must be seeded with an appropriate wildlife conservation seed mixture. All disturbed surfaces must also be stabilized with a thick mat of loose straw mulch, which is free of any contaminants that could promote the spread of invasive plant species. In steeply sloping areas, at the direction of RIDEM, an appropriate erosion-control blanket/matting material (e.g., jute mesh, bio-degradable matting, excelsior matting) must be applied to ensure immediate stabilization.
- (e) Plant all cleared/disturbed areas within the affected portions of the Swamp on the Property, as directed by RIDEM, with balled and burlapped, potted, or transplanted shrub species in an interspersed fashion 8 feet on center and 3 feet tall after planting. The shrubs to be planted within these wetland areas must be obtained from nursery stock that has been raised in hydric conditions. If necessary, to improve survivability, required shrub plantings may be installed within small, raised mounds (slightly elevated only) of high-organic plantable soil material (only). Shrub species must include an equal distribution of at least 3 of the following selections:

Red osier dogwood, *Cornus stolonifera*
Elderberry, *Sambucus canadensis*
Northern arrowwood, *Viburnum recognitum*
Winterberry, *Ilex verticillata*
Highbush blueberry, *Vaccinium corymbosum*
Spicebush, *Lindera benzoin*
Swamp azalea, *Rhododendron viscosum*
Speckled alder, *Alnus rugosa*

Smooth alder, *Alnus serrulata*
Red chokeberry, *Aronia arbutifolia*
Buttonbush, *Cephalanthus occidentalis*
Maleberry, *Lyonia lingustrina*
Swamp Rose, *Rosa palustris*

(f) Within the altered portions of the Perimeter Wetland, plant all disturbed surface areas with trees and shrubs, as directed by RIDEM, as follows:

(i) Throughout those areas defined above, balled and burlapped or transplanted tree species must be planted in an interspersed fashion, 10 feet on center, at least 4 feet tall after planting. Tree species must include an equal distribution of at least 3 of the following selections:

Pitch Pine, *Pinus rigida*
White Pine, *Pinus strobus*
Northern white cedar, *Thuja occidentalis*
Eastern hemlock (disease-resistant variety), *Tsuga canadensis*
White ash, *Fraxinus americana*
White oak, *Quercus alb*
Northern red oak, *Quercus rubra*
Gray birch, *Betula populifolia*
Black birch, *Betula lenta*
Sassafras, *Sassafras albidum*
American beech, *Fagus grandifolia*

(ii) Throughout those areas defined above, balled and burlapped, potted, or transplanted shrub species must be planted in an interspersed fashion, 5 feet on center, 3 feet tall after planting. Shrub species must include an equal distribution of at least 4 of the following selections:

Mountain laurel, *Kalmia latifolia*
Gray (stiff, red panicle) dogwood, *Cornus foemina racemosa*
American cranberrybush, *Viburnum trilobum*
Mapleleaf viburnum, *Viburnum acerifolium*
Highbush blueberry, *Vaccinium corymbosum* (within 10 feet of the Pond only)
Winterberry, *Ilex verticillata* (immediately adjacent to the Pond only)
Speckled alder, *Alnus rugosa* (immediately adjacent to the Pond only)
Smooth alder, *Alnus serrulata* (immediately adjacent to the Pond only)
Sweet pepperbush, *Clethra alnifolia*

Bayberry, *Myrica pennsylvanica*
Black chokeberry, *Aronia melanocarpa*
Witchhazel, *Hamamelis virginiana*

- (g) In addition, following restoration of the applicable portions of the Perimeter Wetland, balled and burlapped or transplanted evergreen screening trees must be planted in a straight line, 8 feet on-center, at least 5 feet tall after planting, along the outermost (landward) edge of the Perimeter Wetland on the Property. Screening tree species must include an equal distribution of at least 2 of the following selections:

White pine, *Pinus strobus*
Eastern hemlock (disease-resistant strain), *Tsuga canadensis*
Northern white cedar, *Tsuga occidentalis*
White spruce, *Picea glauca*

- (h) If any or all the required plantings fail to survive at least 1 full year from the time they have been planted, replant and maintain the same plant species until such time that survival is maintained over 1 full year.
- (i) Following the completion of other wetland restoration requirements, all disturbed surface areas, including those non-wetland areas immediately surrounding the restored wetlands, must be seeded with an appropriate seed mixture, and stabilized with a dense mat of loose straw mulch as described in subsection E(2)(d) above.
- (j) **All restored freshwater wetland areas must be allowed to revert to a natural wild condition.** Aside from those activities considered exempt under Part 3.6 of the FWW Rules, **no future clearing, mowing, cutting, trimming, or other alterations are authorized in any wetland area on the Property without first obtaining a valid permit from RIDEM.**
- (k) The above restoration work must be completed on or before **April 30, 2023**.

F. PENALTY

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, jointly and severally, against each named respondent:

\$13,750

- (2) The proposed administrative penalty is calculated pursuant to Rhode Island's *Rules and Regulations for Assessment of Administrative Penalties* (250-RICR-130-00-1) ("Penalty Rules") and must be paid to RIDEM within 30 days of your receipt of the NOV.

- (3) Penalty payments shall be by one of two methods:
- (a) By certified check, cashier's check, or money order made payable to the **General Treasury – Water and Air Protection Program** and forwarded to:
- Administrator, RIDEM Office of Compliance and Inspection
235 Promenade Street, Suite 220
Providence, RI 02908-5767
- (b) By wire transfer in accordance with instructions provided by RIDEM.
- (4) Penalties assessed against Respondent in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.

G. RIGHT TO ADMINISTRATIVE HEARING

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before RIDEM's Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections B through F above. All requests for hearing MUST:
- (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b).
- (b) Be **RECEIVED** by RIDEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:
- Administrative Clerk
RIDEM - Administrative Adjudication Division
235 Promenade Street, Suite 350
Providence, RI 02908-5767.
- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b).
- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Part 1.7(B) of Rhode Island's *Rules and Regulations for the Administrative Adjudication Division* (250-RICR-10-00-1).

- (2) A copy of each request for hearing must also be forwarded to:

Christina Hoefsmit, Esquire
RIDEM - Office of Legal Services
235 Promenade Street, 4TH Floor
Providence, RI 02908-5767

- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before RIDEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner regarding any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) An original signed copy of the NOV is being forwarded to Town of Coventry, Rhode Island to be recorded in the Office of Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and 2-1-24, as amended.
- (7) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Christina Hoefsmit of RIDEM's Office of Legal Services at (401) 222-6607 ext. 2772023 or at christina.hoefsmit@dem.ri.gov. All other inquiries should be directed to David E. Chopy of RIDEM's Office of Compliance and Inspection at (401) 222-1360 extension 2777400 or at david.chopy@dem.ri.gov.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

By: _____
David E. Chopy, Administrator
RIDEM Office of Compliance and Inspection

Dated: _____

CERTIFICATION

I hereby certify that on the _____ day of _____
the within Notice of Violation was forwarded to:

Sharon Drive LLC
c/o Paul DeMarco, Esq., Registered Agent
620 Main Street, CU 3A
East Greenwich, RI 02818

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY

Program: Freshwater Wetlands
 File No.: OCI-FW-16-166
 Respondent: Sharon Drive LLC

GRAVITY OF VIOLATION

SEE ATTACHED "PENALTY MATRIX WORKSHEETS."

VIOLATION No. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D (1) and D (2) Wetland Alterations to Pond and Fringe Swamp- Fact C(9)(a)	Type I <i>(\$10,000 Max. Penalty) *</i>	Major	\$10,000	1 violation	\$10,000
D (1) and D (2) Wetland Alterations to Perimeter Wetland – Fact C(9)(b)	Type I <i>(\$5,000 Max. Penalty) *</i>	Major	\$3,750	1 violation	\$3,750
SUB-TOTAL					\$13,750

*Maximum Penalties represent the maximum penalty amounts per violation.

ECONOMIC BENEFIT FROM NONCOMPLIANCE

COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT COMPLY. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS:

- THERE IS NO IDENTIFIABLE BENEFIT FROM NONCOMPLIANCE, OR
- THE AMOUNT OF ECONOMIC BENEFIT CAN NOT BE QUANTIFIED.

A review of the record in this matter has revealed that Respondent enjoyed an identifiable benefit from the noncompliance alleged in this enforcement action; however, the amount of economic benefit cannot be quantified.

COST RECOVERY

ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.

A review of the record in this matter has revealed that RIDEM has not incurred any additional or extraordinary costs during the investigation, enforcement, and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$13,750

PENALTY MATRIX WORKSHEET

CITATION: Wetland Alterations to Pond and Fringe Swamp – Fact C (9)(a)

VIOLATION NOs.: D (1) and D (2)

TYPE		
<u> X </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare, or environment.	<u> </u> TYPE II <u>INDIRECTLY</u> related to protecting health, safety, welfare, or environment.	<u> </u> TYPE III <u>INCIDENTAL</u> to protecting health, safety, welfare, or environment.
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Part 1.10(A)(1)(b) of the Penalty Rules.</p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondents altered freshwater wetlands by filling (in the form of soil material and components of shoreline improvements) and grading within a Pond to construct a retaining wall, boat ramp, and dock, as well as to create and maintain a lawn; and clearing, stumping, filling (in the form of at least soil material), grading, and creating surface disturbance within a fringe Swamp associated with the Pond. (2) Environmental conditions: Prior to the alterations, the Pond and Fringe Swamp were relatively undisturbed and natural. There was a portion of the shoreline along the western edge of the lot that was cleared and maintained for access to the Pond. The remainder of the Pond edge (northeast corner and northern edge) and Fringe Swamp appeared intact and naturally vegetated. (3) Amount of the pollutant: Considered, but not utilized for this calculation. (4) Toxicity or nature of the pollutant: Considered, but not utilized for this calculation. (5) Duration of the violation: Full duration unknown – at least 6 years based on a review of August 2016 aerial photographs showing some of the alterations present. (6) Areal extent of the violation: Approximately 4,250 square feet. 		
(continued)		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent has not taken reasonable and appropriate steps to prevent and/or mitigate the noncompliance. Respondent failed to obtain a permit from RIDEM and has failed to restore the altered wetlands, despite receiving the NIE from RIDEM requiring it do so.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit, or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the project.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<input checked="" type="checkbox"/> MAJOR	MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$5,000 to \$10,000 \$10,000	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500

PENALTY MATRIX WORKSHEET

CITATION: Wetland Alterations to Perimeter Wetland – Fact C (9)(b)
 VIOLATION NOs.: D (1) and D (2)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare, or environment.</p>	<p style="text-align: center;">___ TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare, or environment.</p>	<p style="text-align: center;">___ TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare, or environment.</p>
DEVIATION FROM THE STANDARD		
<small>THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</small>		
<p>FACTORS CONSIDERED:</p> <p>Taken from Part 1.10(A)(1)(b) of the Penalty Regulations.</p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent altered freshwater wetlands by clearing, stumping, filling (in the form of at least soil material), grading, creating surface disturbance, establishing, and maintaining lawn, and maintaining an access driveway within Perimeter Wetland. (2) Environmental conditions: Prior to the alterations, the Perimeter Wetland was largely naturally forested and undisturbed. There was a cleared/maintained portion of Perimeter Wetland in the western portion of the Property, adjacent to the Pond edge (presumably for access to the Pond). (3) Amount of the pollutant: Considered, but not utilized for this calculation. (4) Toxicity or nature of the pollutant: Considered, but not utilized for this calculation. (5) Duration of the violation: Full duration unknown – at least 6 years based on a review of August 2016 aerial photographs showing some of the alterations present. (6) Areal extent of the violation: Approximately 11,000 square feet. 		
(continued)		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent has not taken reasonable and appropriate steps to prevent and/or mitigate the noncompliance. Respondent failed to obtain a permit from RIDEM and has failed to restore the altered wetlands, despite receiving the NIE from RIDEM requiring it do so.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit, or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the project.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<u>X</u> MAJOR	MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$5,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$2,500 to \$5,000 \$3,750	\$1,250 to \$2,500	\$500 to \$1,250
	MODERATE	\$1,250 to \$2,500	\$500 to \$1,250	\$250 to \$500
	MINOR	\$500 to \$1,250	\$250 to \$500	\$100 to \$250