

REPORT OF
INTER-DEPARTMENTAL
COMMITTEE ON
LAND USE IN THE
BORDER RANGES AREA

- SECTION A - REPORT AND MAPS
- SECTION B - BACKGROUND PAPER
- SECTION C - ASSOCIATED SUBMISSION
FROM NATIONAL PARKS
AND WILDLIFE SERVICE
TOGETHER WITH
- (i) THEIR AMENDMENTS
TO APPENDIX 1 TO
THE REPORT; AND
- (ii) THEIR COMMENTS ON
SECTION 3 AND
SECTIONS 11.2, 11.5
AND 11.6 OF THE
BACKGROUND PAPER

SUBMISSIONS CLOSE WITH :-
STATE POLLUTION CONTROL COMMISSION
Box 4036
GPO
SYDNEY
2001
ON 31ST MARCH 1978

SECTION A

REPORT OF INTER-DEPARTMENTAL COMMITTEE

on Land Use in the Border Ranges Area

to Development Co-ordinating Committee

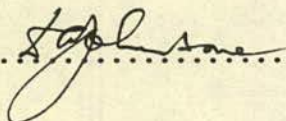
of Cabinet.

30th September 1977


Members:

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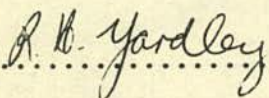

J. Henry -
Forestry Commission

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D. Johnstone -
National Parks & Wildlife Service

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B. Talty -
Department of Decentralisation & Development

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R. Yardley -
Planning & Environment Commission.

Inter-departmental Committee to Investigate
Management Policy for the Border Ranges Area

Report to the Development Co-ordinating Committee of Cabinet

1. At its Cabinet meeting on 3rd August, 1976, the Government agreed to set up an inter-departmental committee to investigate the management policy for the Border Ranges area, for the purposes of preparing a report to Cabinet of relevant employment, environmental and economic aspects.
2. Members of the committee were:
 - Mr. J. L. Henry, Chairman and convener (nominated by the Minister for Conservation & Water Resources)
 - Mr. D. A. Johnstone (for Minister for Lands)
 - Mr. B. Talty (for Minister for Decentralisation & Development)
 - Dr. R. Yardley (for Minister for Planning & Environment).
3. The committee commissioned the preparation of a background paper setting out the general facts relating to the area of concern and to the controversy that had developed over future land use in this area. Copies of this background paper, including a submission from the National Parks & Wildlife Service, accompany this report and provide the basis for the various management options that are presented below.
4. The committee met on a number of occasions in Sydney, visited the Kyogle area for field inspections of the land in question, and inspected the two major mills involved in the utilisation of timber harvested from the area of concern.
5. The area of concern lies along the border with Queensland and contains three State Forests, Wiangaree, Roseberry and Mt. Lindesay, with a total area of about 33 000 ha. Approximately half of this area of State Forest carries rainforest vegetation.
6. The area is one of considerable scenic and recreational attraction, and it contains features of significant biological interest in the occurrence of unusual plants and plant communities and of species of rare or endangered fauna.
7. In support of the establishment of a National Park in the area, the National Parks & Wildlife Service has submitted that:
 - (a) Only about 20 per cent of the original rainforest areas in the Richmond and Tweed Valleys remain to-day. The largest remaining area of each of the four major sub-formations of rainforest - sub-tropical, warm temperate, cool temperate and dry - occurs in the area under study.
 - (b) This area lies in the narrow zone of overlap between tropical and southern floras and faunas.
 - (c) A number of habitat types which are well developed in this area are not as yet well represented in existing National Parks or Nature Reserves in the region.

- (d) The mammal fauna of the area is an extremely rich and varied one. Preservation of large, contiguous sections of land system complexes, to sample adequately the range of habitats present, is necessary to maximise the probability of preserving this fauna in the long-term.
 - (e) Logging of the forests is not compatible with the retention of high conservation values.
 - (f) The scenery of the area is outstanding. Only under the National Parks and Wildlife Act can the quality of this scenery receive full recognition.
 - (g) The potential for recreation in the area is extremely high, and the National Parks & Wildlife Service endorses the concept of a scenic rim of forested land extending along the scarp of the Queensland river system from Lamington National Park to Cunningham's Gap, and involving in part the area under study.
 - (h) Existing facilities in Lamington National Park are under pressure from heavy usage. Joint management of a much larger National Park spanning the border is necessary to reconcile the ideals of natural area recreation with those of nature conservation in the area.
8. Several areas have been identified as having outstanding natural values. These are:
- Mt. Glennie, on Roseberry State Forest, which possesses many features that warrant the preservation of the plant communities towards its summit. There are also good examples of dry rainforest communities present in this area.
- The Lynchs Creek basin of Wiangaree State Forest appears to contain a sample of lowland sub-tropical rainforest, not elsewhere well conserved.
- Lever's Plateau carries sub-tropical rainforest developed on soils derived from rocks with a somewhat different geological history from those on Wiangaree State Forest. Apparently as a result of past historic events, part of this plateau carries an overstorey of Hoop Pine above the rainforest. This plateau has been shown to support a particularly rich mammal fauna, with 25 species having been recorded.
9. Conditions on the plateau surface of Wiangaree State Forest do not appear to differ significantly from those represented in the adjacent Lamington National Park.
10. The State Forests in the area of concern form about two thirds of the forest resource of the Kyogle Forest Management Area. They have been used for many years for timber production, and there is an annual timber quota commitment from the whole Management Area as follows:

Munro and Lever Pty. Ltd. (Grevillia)	17 850 m ³
Standard Sawmilling Co. Pty. Ltd. (Murwillumbah)	9 610
Total	<u>27 460 m³</u>

In addition there are several smaller quotas applicable only to certain specific limited areas within Wiangaree State Forest. These are:

Munro and Lever Pty. Ltd.	5 110 m ³
James Hurford & Co. Pty. Ltd. (Lismore)	800 m ³
M. Hogan (Kyogle)	1 620 m ³

11. Both major mills also draw some timber supplies from adjoining areas outside the Kyogle Management Area, namely the Urbenville and Murwillumbah Management Areas (see Annexure 2), but supplies from these sources are definitely not able to be increased in the foreseeable future. In the case of the Murwillumbah Management Area supplies will probably have to be reduced in the near future.
12. Both mills have invested considerable sums of money in new plant in recent years, after ensuring as best they could by approaches to the N.S.W. Government that the available resource would not be further diminished. Investment by Standards at Murwillumbah is in the order of \$5 million in plant and buildings, and by Munro and Lever in the order of \$3 million.
13. The Forestry Commission has submitted that:
 - (a) Logging in the rainforest is on a selective basis, aimed as far as practicable at retaining the essential structure and composition of the rainforest while producing a yield of timber.
 - (b) About one third of the area of the three State Forests would in any case be excluded from logging because of its inclusion in existing Flora Reserves (1960 ha) or because of other constraints, including creekside or roadside location and physical impediments.
 - (c) Under present forest management practices the forest areas are currently being extensively used for recreation, particularly because of the access provided by logging roads.
 - (d) Though suitable in the long run for the sustained production of timber, the present rate of timber harvesting is substantially greater than the Kyogle Management Area can sustain. If the present rate and standards of harvesting continue, without any other diminution in the resource, logging will have to cease by about 1986. There would still be considerable volumes of timber remaining in the selectively logged stands and the Flora Reserves, but a period of about 25 years should elapse before logging should be permitted to resume in the previously logged stands, and then at a much lesser rate.
 - (e) Because of its extent and quality, the rainforest in and immediately adjoining the Kyogle Management Area provides probably the only opportunity in N.S.W. for the eventual sustained production of rainforest timbers for specialty purposes at an economic level of production. Rainforest logging to meet past commitments is also under way in the Wauchope and Coffs Harbour Forestry Districts, but for silvicultural reasons the Forestry Commission would much prefer to see these more southerly operations cease rather than those in and adjoining the Kyogle Management Area.
14. Whilst a local planting programme of appropriate trees, such as Hoop Pine, could ultimately provide an increased yield of timber in the area, the resumption of such a programme, with the present management practice of selective logging, now could not overcome the threatened hiatus in timber supplies from about 1986 unless the quota commitments to one, other or both of the local mills could be reduced.

15. The Department of Decentralisation & Development has submitted that:
- (a) Maintenance of job opportunities is the primary consideration.
 - (b) The two major mills obtaining timber from the area have a total employment of about 300, of which the employment of about 180 is attributable to production from the Kyogle Management Area.
 - (c) At the end of July, 1977, there were 389 people registered as unemployed in Kyogle Shire : 229 adult males, 49 adult females, 65 junior males and 46 junior females. The Casino office of the Commonwealth Employment Service reports a ratio of 49:1 for applicants : job vacancies.
 - (d) Opportunities for further jobs in the area are minimal.
16. From discussions with Standard Sawmilling Co. Pty. Ltd., it appears that continued employment in the mills and forests could be achieved by a payment to that mill in the order of \$1 million, in order to reduce its capital debt charges, thus allowing the mill to forego its quota of timber from the Kyogle Management Area and to substitute by the increased import of more expensive logs from the Pacific region for processing at its Murwillumbah mill. In such an event, coupled with the early resumption of planting in the area and with no significant reduction in the native forest resource availability, sustained supplies of timber to Munro and Lever Pty. Ltd. at Grevillia would appear feasible at the current level. Further confidential information relating to the situation at the two mills is attached in Annexure 2.
17. Because of uncertainty on the future management of this area, the committee has not considered the claim by Mr. E. W. McBride, a person of Aboriginal descent, for the purchase or grant of a specified section of Roseberry State Forest.

Recommendations

18. The committee has been unable to agree on any recommendations for the future use and management of the area in question. However it has instead drawn up a number of management options to guide the Government in its decisions on this matter. It should be realised that those listed cover a broad spectrum of possible management strategies. These options are listed below and are discussed separately in more detail, with comments on the effects of each, in Annexure 1.

Option 1. Convert all of the three State Forests to National Park.

Option 2. Establish a Nature Reserve over much of Roseberry State Forest, with a corridor linking eastwards to adjoin the Lamington National Park and a separate Nature Reserve in the lowland basin of Lynchs Creek, on Wiangaree State Forest.

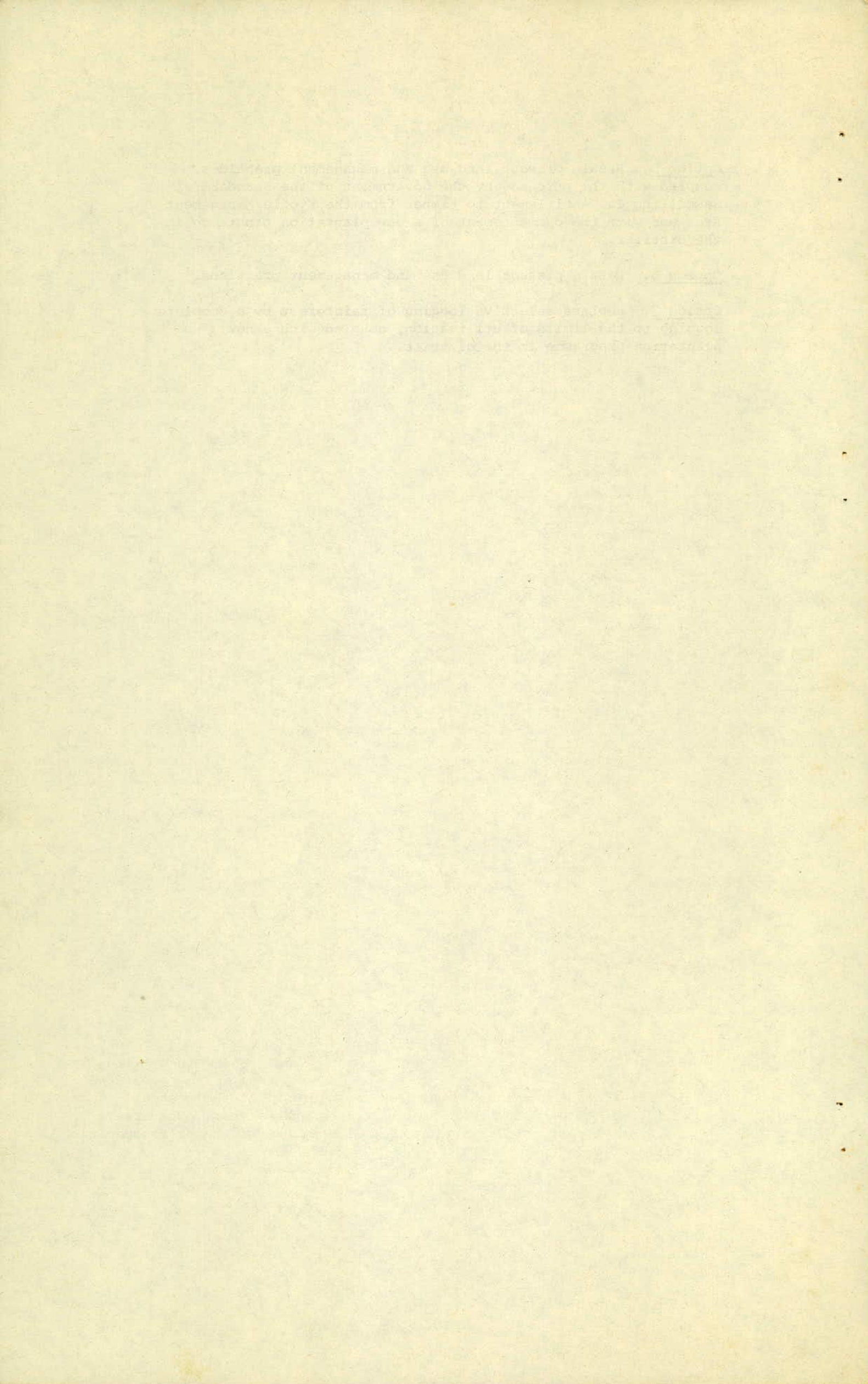
Option 3. Establish a series of smaller Nature Reserves over sites considered to be of particular biological significance, and provide for a preserved scenic rim along the Queensland border.

Option 4. As for Option 3, but with the significant areas preserved as Flora Reserves, under the control of the Forestry Commission, instead of as Nature Reserves under the control of the National Parks & Wildlife Service.

Option 5. Retain present land use and management practices, coupled with the purchase by the Government of the Standard Sawmilling Co. entitlement to timber from the Kyogle Management Area and with the commencement of a new plantation programme in the district.

Option 6. Retain present land use and management practices.

Option 7. Replace selective logging of rainforest by a complete logging to the limits of utilisation, coupled with a new plantation programme in the district.



Comments on Suggested Management Options

Note: It should be noted that the equivalent of about one year's additional supply of timber is available to Munro & Lever Pty. Ltd. from its own private sources in Queensland. This source has not been taken into consideration in the following options.

Option 1

Action Convert all of the three State Forests to National Park.

Effects Dedication of a National Park embracing all of the Border Ranges would ensure preservation of an excellent, representative sample of the natural communities present in this critical zone of overlap between tropical and temperate floras and faunas. Natural communities of this zone are not as yet adequately sampled by existing National Parks and Nature Reserves.

A National Park would preserve as a single land unit a spectrum of distinct rainforest types which include a number of rare plants, and plants at the known geographical limits of their distribution, and permanently protect the various pathways which have contributed to the wide variety of flora present in the Border Ranges.

Creation of a National Park would allow the Border Ranges to be managed as a single, cohesive land unit. Included in this unit will be Limpinwood Nature Reserve and Lamington National Park. Only by such an integrated approach to land management can the ideals of nature conservation be successfully reconciled with those of recreation and wilderness.

The National Parks & Wildlife Service submits that creation of a National Park would, by termination of logging activities in the Border Ranges, greatly increase the value of the area for wildlife habitat and also enhance its value as a recreational facility.

By dedication of the three (3) State Forests as National Park the outstanding scenery of the Border Ranges would receive full recognition; scenic values can only receive protection under the National Parks and Wildlife Act.

The Forestry Commission, on the other hand, submits that forest management does not significantly affect the scenery, particularly the scenic rim, and by providing access has made the area more available for recreational use. It is at present being extensively used by the public for this purpose.

This option will reduce the timber available for harvesting from the Kyogle Management Area to about 70 000 cubic metres, or about 2½ years life at the present rate and standard of cut. Only about one fifth of this volume is of rainforest species and virtually none is of Hoop Pine, yet much of the current sawmilling operations in the area are designed around these species. At the present rate, rainforest supplies would last less than a year. The area of State Forest still carrying area allocations of timber to specific mills all lies within the proposed National Park.

The remaining area of State Forest within the present Kyogle management area could be too small to support any viable sawmilling operation. This management area therefore would be amalgamated into adjoining forest management areas and the Kyogle Forestry Sub-District office closed.

The operations of both the Munro and Lever (Carrick) and Standards would be completely uneconomic so that the present plants would close. However, the quotas of these mills from the Urbenville and Murwillumbah Sub-Districts in their own right could form the basis for much smaller sawmill operations, either in other existing sawmills or with completely re-designed plants. Neither of these could be expected to be in the Kyogle/Grevillia area.

About 180 jobs in the timber industry in the Kyogle and Murwillumbah area would be lost within the next 2½ years. However, as outlined under Option 5, the expenditure of approximately \$1 million could enable Standards to continue operating at their current level using imported timber.

Some claim for financial compensation on both legal and moral grounds could be expected. It is pointed out that there are both area and volume commitments to sawmillers and both sawmillers in good faith approached the N.S.W. Government (either through the responsible Minister or the Forestry Commission) for some guarantee of continuity of supply before investing significant capital. The loss of the resource without compensation would seriously undermine the confidence of the wood-using industries in any Government commitment.

Option 2

Action Establish a Nature Reserve over much of Roseberry State Forest, with a corridor linking eastwards to adjoin the Lamington National Park, and a separate Nature Reserve in the lowland basin of Lynchs Creek, on Wiangaree State Forest.

Effects This option would be aimed at preserving important habitat types in the area in the form of viable conservation units. The Roseberry Nature Reserve would have a greatly enhanced value for preservation of fauna by addition of a reserved migration route for biological species, linked to preserved nature conservation areas in the east. Adequate samples of each of the four main rainforest types present in the Border Ranges would be preserved. The dry rainforests of Roseberry State Forest, which are of the greatest importance for nature conservation would be securely preserved. The very rich fauna of Lever's Plateau would also be preserved.

There would be no provision for a recreational component in the management of the proposed Nature Reserves, other than, perhaps, a walking track along the Border Rim. The Nature Reserve areas would be managed solely for nature conservation.

The Wiangaree Plateau which supports the largest continuous expanse of rainforest remaining in New South Wales, would be subjected to timber extraction for an indefinite period. The National Parks & Wildlife Service has submitted that nature conservation and scenic and recreational values on the Wiangaree Plateau would be significantly impaired by the forestry activities.

The Forestry Commission again would submit that forestry activities do not significantly impair the scenic and recreational values and that even now the area is being widely used for recreation.

Whilst much of the fauna of the Border Ranges would probably be preserved by these Nature Reserves, the forestry activities on Wiangaree Plateau would need to be sympathetically oriented to retention of habitat values to maximise the probability of preserving larger mammals of the area. The Service would be unable to ensure such management if Wiangaree Plateau remains a State Forest.

The effects on the timber industry would be similar to, but not quite so immediately drastic as with, Option 1. The allocated area would not be affected. Available volume on the other areas remaining as State Forest in the management area would be reduced to an estimated 105 000 cubic metres, or about 4 years supply at the present rate and standard of cut, and the proportion of rainforest volume would rise to about one third.

In the long term a continuing yield of specialty rainforest timbers could be obtained from the remaining State Forest areas, though possibly not in sufficient volume to support an economic unit.

These State Forests would most logically be amalgamated into adjoining forest management areas, and the Kyogle Forestry Office closed.

It is thought that both companies would consider that this option would render their operations uneconomic in the near future and would take early steps to wind down their affairs and place their business on the market.

Option 3

Action Establish a series of smaller Nature Reserves over sites considered to be of particular biological significance, and providing for a preserved scenic rim along the Queensland border.

Effects This would involve the establishment of two smaller Nature Reserves, one covering the plateau of Mt. Glennie and the adjacent head of Sawpit Creek, and the other part of the Lynchs Creek valley below the cliff line. In addition a strip at least 200 metres wide would be retained free of logging along the Queensland border for the length of the three State Forests in the area.

The National Parks & Wildlife Service has indicated that it would seek a more extensive series of Reserves, and on this basis has commented:

"A series of small Nature Reserves would preserve, as isolated samples, some of the most critical plant and animal communities of the Border Ranges.

"The scientifically important communities of Mt. Glennie would be afforded protection, as would the most valuable areas of dry rainforest in Sawpit and October Creeks and on Mahoney's Spur. The small proposed reserve in Wild Cattle Grass would preserve pastures for macropods; at Terrace Creek an interesting stand of Dunn's White Gum would be protected. The Nature Reserve on the south-western half of Lever's Plateau would preserve the immediate area where a very rich mammal fauna has recently been recorded. The Nature Reserve on the northern rim of Lever's Plateau would adequately preserve the fine stands of mature Hoop Pine. Establishment of a Nature Reserve in Lynch's Creek Basin would sample a particularly important area of lowland subtropical rainforest. Retention of a narrow Border Rim of natural vegetation would have little value for Nature conservation but would preserve the integrity of this rim in terms of recreation.

"Scientific evidence available indicates that the long term preservation of flora and fauna could not be ensured by preserving only small 'islands' of natural habitat within a 'sea' of logged forests.

"Fragmentation of land use within this land unit would present very great management problems for the Service, e.g. fire control, weed control, problems with surrounding forestry practices.

"No opportunity for recreation, other than walking along the Border Rim could be provided for by the Service, and intensive management of the wildlife and natural habitat would be required.

"Options for establishing a cohesive conservation unit within the Border Ranges would be irreversibly closed.

"No recognition could officially be given to protection of the present scenic values of the Border Ranges."

The proposal as originally stated would reduce the volume of available timber remaining on the State Forests by about 20 000 cubic metres, or by less than one year's supply, so that at the current rate and standard of timber harvesting, logging in the State Forests of the Kyogle management area and present employment could continue for slightly over 8 years, instead of the 9 years if there were no further exclusions. About three-quarters of the foregone volume would be in rain-forest species, including Hoop Pine. A more extensive series of Reserves would have a correspondingly greater effect on timber supplies.

The additional approaches suggested in Option 5 (purchase of Standards' Kyogle entitlement; liquidation of existing Hoop Pine plantations; resumption of a local conifer plantation programme) could also be applied to this proposal (and to Option 4), with generally similar effects but with some small further reduction in the Munro and Lever annual entitlement over the initial period of 25 years.

Option 4

- | | |
|----------------|--|
| <u>Action</u> | As for Option 3, but with the significant areas preserved as Flora Reserves, under the control of the Forestry Commission, instead of as Nature Reserves under the control of N.P.W.S. |
| <u>Effects</u> | Generally as for Option 3, but it would retain control of the whole areas under one organisation possibly with some administrative advantages, and would facilitate management of the area as an integral unit for multiple use forest management. (Flora Reserves are constituted under the Forestry Act, are subject to working plans approved by the Minister, and can only be revoked by Act of Parliament.) |

The National Parks and Wildlife Service, as the body responsible for Nature conservation in N.S.W. would have no direct authority in the area.

Small areas, such as these Flora Reserves, are known to require intensive surveillance and management in order that the natural communities are retained in the long term; damage caused by such agencies as fire, cyclone and landslip can permanently destroy small isolated areas.

Option 5

Action Retain present land use and management practices, coupled with the purchase by the Government of the Standard Sawmilling Company entitlement to timber from the Kyogle management area and with the commencement of a new plantation programme in the district.

Effects This proposal optimises long term employment and timber production from the State Forests in the area. Subject to negotiation and agreement, the purchase of Standards' entitlement to timber from the Kyogle management area could enable this mill to continue in operation using more expensive imported timbers, and at the same time reduce the annual quota commitment from the Kyogle forests from 27 460 cubic metres to 17 850 cubic metres.

This would mean that the area could sustain the now decreased quota until about 1991, when the existing Hoop Pine plantations in the Kyogle/Urbenville area should be of sufficient development to supply saw and veneer logs for a further 11 years, i.e. to about 2002 A.D. This would in turn mean that the present plantations would be cut out in approximately 25 years' time, thus allowing sufficient time for a new plantation programme to start producing sawlogs. This new planting programme would have to be in the order of 100 ha a year, building up to a total area of about 1500 ha. In time this volume would be supplemented by a lower sustained yield from the other natural areas of State Forest in the management area.

The proposal involves the precedent of buying out a mill's interest in what is legally merely an annual entitlement in order to enable the mill to continue in operation by using more expensive alternative imported sources of timber.

The proposal also involves commitment to a new local conifer planting programme in the area. Even with the planting of the valuable native conifer, Hoop Pine, such a programme would not in the short-term (under about 40 years) provide a quality of log that would realistically substitute for those being obtained from the rainforest, and for this reason the programme would appear best to involve the planting both of Southern Pines (*Pinus elliottii* or *P. taeda*) which are initially faster growing than Hoop Pine, though ultimately less productive and of lower intrinsic value, and of Hoop Pine. The programme would need to start immediately.

The planting programme would involve the acquisition of lands suitable for these species or, in the case of Hoop Pine, the clearing of previously cut-over rainforest, and would involve the Government in a continuing project that would be considerably less economic than, for example, the existing *Pinus radiata* plantation projects. The planting rate of 100 ha a year in the case of Hoop Pine would cost in the order of \$150,000 a year. For a *Pinus* programme of comparable size the cost would be in the order of \$50,000 plus land costs.

Preservation of communities in a natural state would be restricted to the present system of Flora Reserves. Local extinctions of species of fauna, and possibly some species of flora, may be expected to occur. Populations of other species would probably be reduced to low levels with little chance of survival in the long term. Options for preserving viable samples of natural communities which now only exist in the Border Ranges would be permanently closed. Facilities for recreation in a natural environment would be further reduced, because of development of scrubby undergrowth and weed infestations in the forests.

Option 6

Action Retain present land use and management practices.

Effects This represents a continuation of existing operations and, assuming the quota commitments to both mills are maintained, would result in the exhaustion of timber supplies from the management area in about 9 years time. Apart from the existing sustained yield of 12 000 cubic metres from the Hoop Pine plantations, there would then be a hiatus in further timber supplies from the area for about 25 years, after which selective logging at a reduced rate could recommence. Reduced quota commitments would allow the existing resource to last for a longer period and the hiatus in supplies to be shortened, but would not appear practicable in view of the nature of the existing mill establishments and staff.

As with Option 5, in the long term this would allow for a sustained supply of specialty rainforest timbers and it does not make any additional provisions for preservation or recreation, its effects here again being as for Option 5.

Option 7

Action Replace selective logging of rainforest by a complete logging to the limits of utilisation, coupled with a new conifer plantation programme in the district.

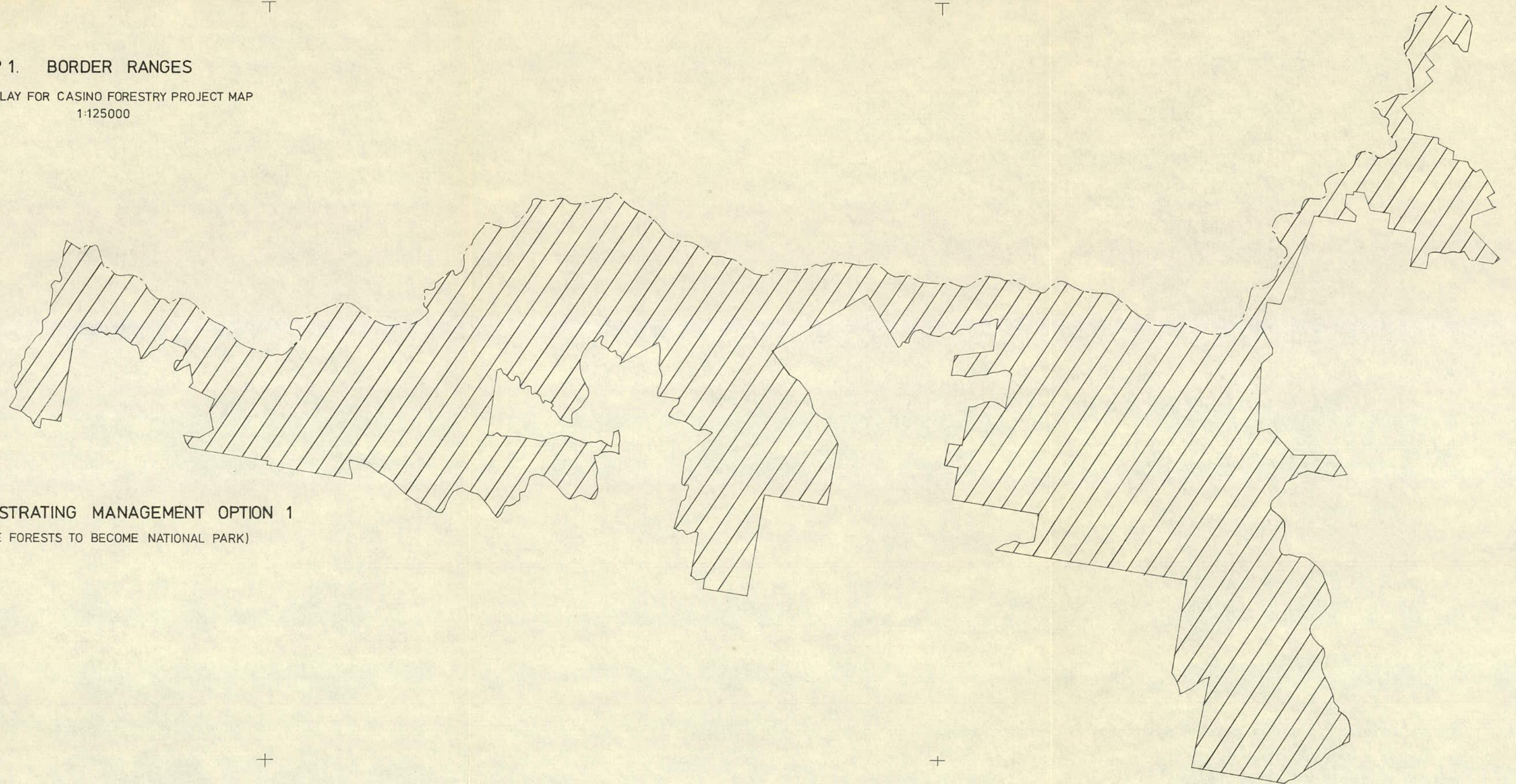
Effects The objects of this proposal are to maintain both mills in operation by undertaking a new conifer planting programme to provide timber supplies after a period of about 25 years, and in the meantime to supply timber from the complete, as opposed to current selective, logging of the forests in the management area. Volumes of timber remaining in the previously selectively logged stands, as well as those stands not yet logged, are estimated to be adequate to maintain the operation comfortably over the necessary period. A plantation resource in excess of 2000 ha would be required, and the comments made about conifer planting in relation to Option 5 apply similarly here, but in respect to a still larger programme.

This radical alteration of habitat would result in widespread and permanent destruction of much of the flora and fauna and natural habitat of the Border Ranges. Natural scenic values would be reduced even further than they have been by current forestry practices. It may be many centuries before there would be recovery of the forests to a mature, climax state; some rainforest types may never regenerate.

However about a third of the area would not be logged because of existing constraints.

MAP 1. BORDER RANGES

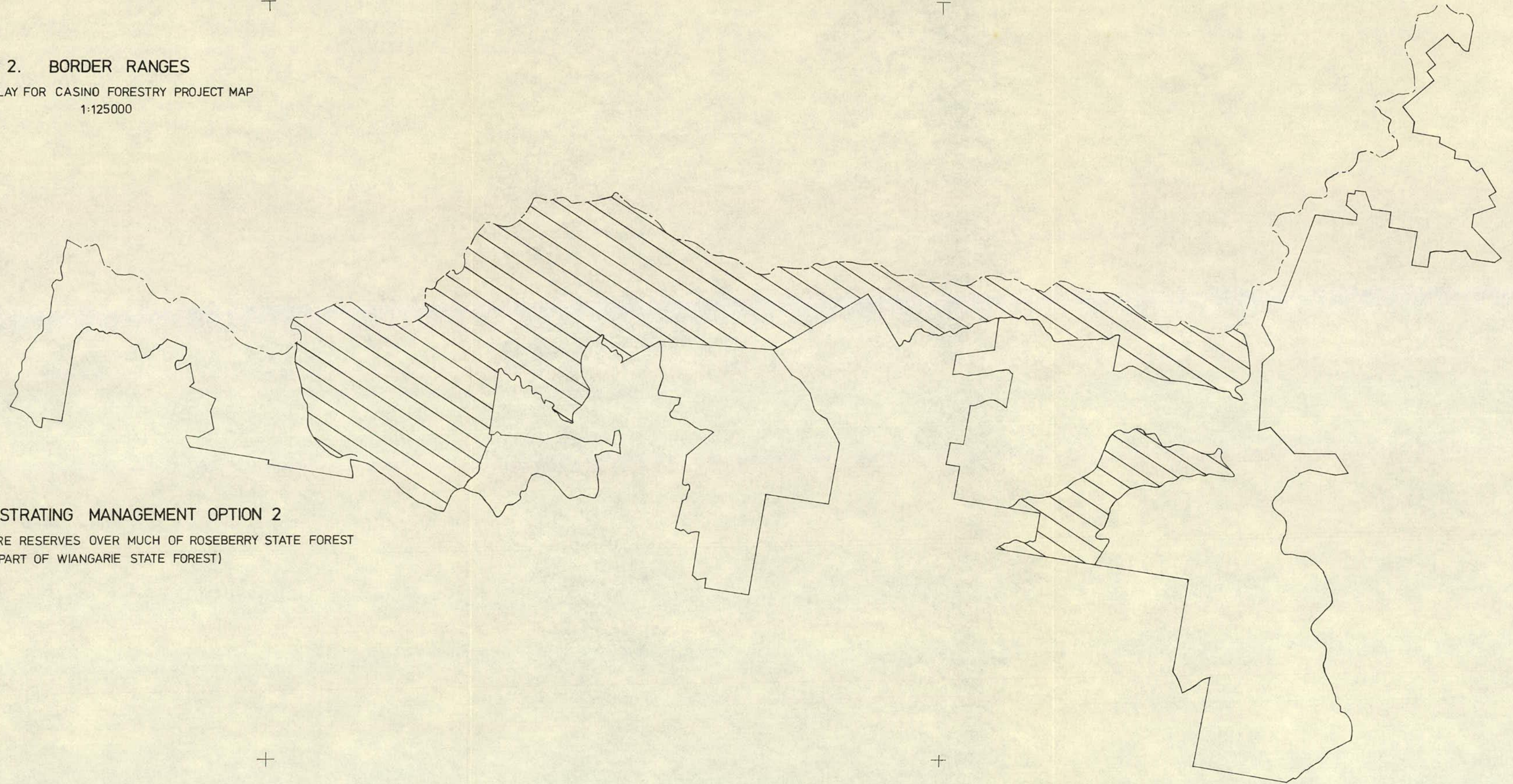
OVERLAY FOR CASINO FORESTRY PROJECT MAP
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ILLUSTRATING MANAGEMENT OPTION 1
(STATE FORESTS TO BECOME NATIONAL PARK)

MAP 2. BORDER RANGES

OVERLAY FOR CASINO FORESTRY PROJECT MAP
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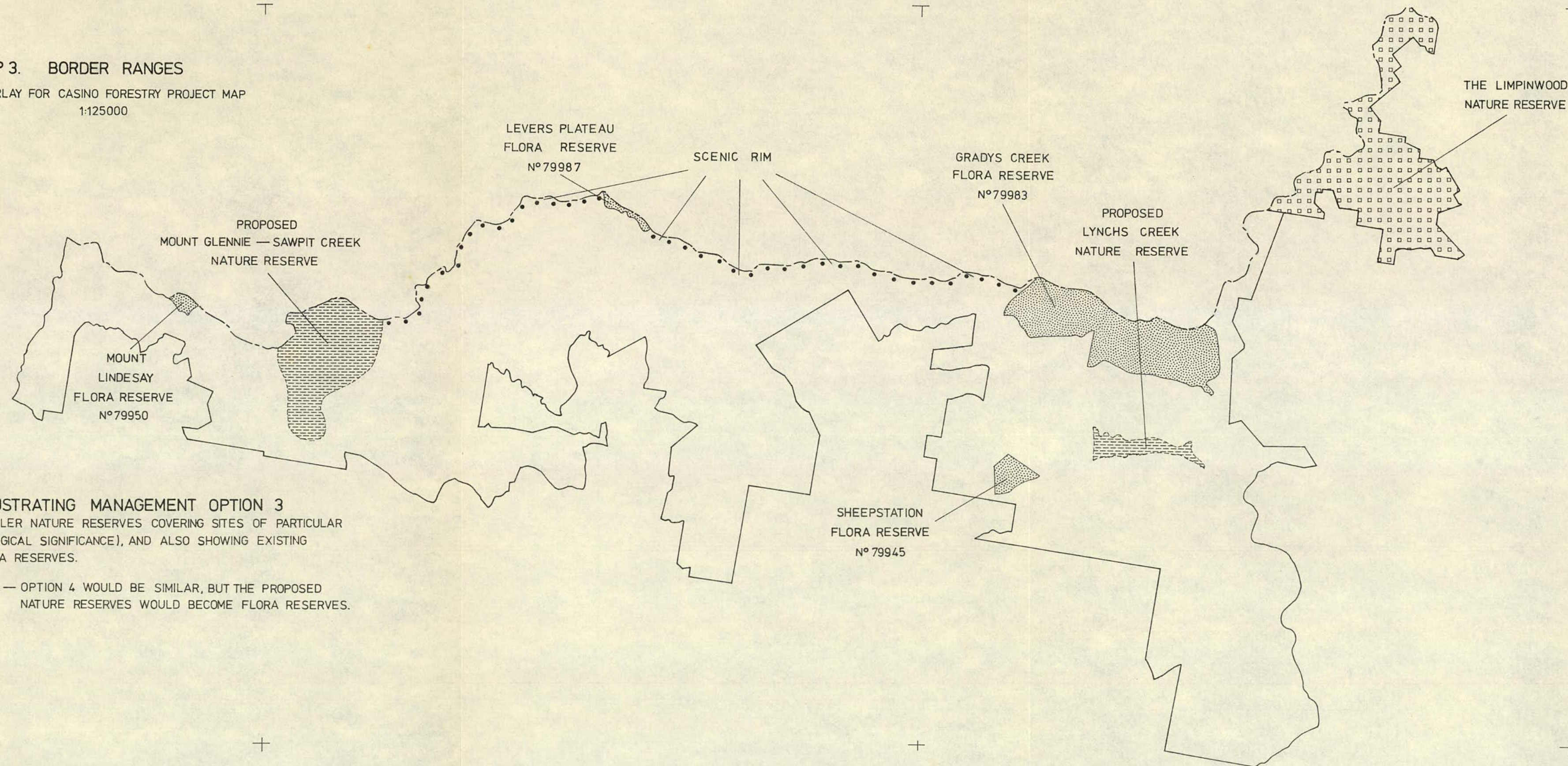


ILLUSTRATING MANAGEMENT OPTION 2

(NATURE RESERVES OVER MUCH OF ROSEBERRY STATE FOREST
AND PART OF WIANGARIE STATE FOREST)

MAP 3. BORDER RANGES

OVERLAY FOR CASINO FORESTRY PROJECT MAP
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ILLUSTRATING MANAGEMENT OPTION 3

(SMALLER NATURE RESERVES COVERING SITES OF PARTICULAR BIOLOGICAL SIGNIFICANCE), AND ALSO SHOWING EXISTING FLORA RESERVES.

NOTE — OPTION 4 WOULD BE SIMILAR, BUT THE PROPOSED NATURE RESERVES WOULD BECOME FLORA RESERVES.