



EARTHTRADE
SPECIALISTS IN
OFFSET SOLUTIONS
A HERRON TODD WHITE COMPANY

EPBC 2013/7025 Kemmis 2, Sth Walker Creek Mine EPBC 2014/7272 Sth Walker Creek Mulgrave Pit Extension Offset Compliance Report



EPBC 2013/7025: Kemmis 2, South Walker Creek Mine
EPBC 2014/7272: South Walker Creek Mulgrave Pit Extension
Offset Compliance Report

Date 23rd May 2016
Prepared for BHP Billiton Mitsui Coal Pty Ltd
Our Ref 20161964A

ACN 128 110 976
ABN 87 128 110 976

Registered address
Level 1, 811 Gympie Rd
Chermside QLD 4032

Postal address
PO Box 1069
Hervey Bay QLD 4655

Telephone 07 4194 5009
info@earthtrade.com.au
earthtrade.com.au

Document Tracking

Item	Detail
Project Name	EPBC 2013/7025: Kemmis 2, South Walker Creek Mine EPBC 2014/7272: South Walker Creek Mulgrave Pit Extension Offset Compliance Report
Project Number	QR061.CR
Project Manager	Alan Key 07 4194 5009 PO Box 1069 Hervey Bay QLD 4655
Prepared by	David Sasse Alan Key
Status	DRAFT – for review by client

Document Control

Version Number	Date	Revision Details	Prepared by	Approved by
20161964A	23 May 2016	First draft	David Sasse	Alan Key

This report should be cited as: *Poitrel Mine – Offset Compliance Report*

ACKNOWLEDGEMENTS:

This document has been prepared by Herron Todd White Environmental Pty Ltd t/a Earthtrade with support from BHP Billiton Mitsui Coal Pty Ltd (**BMC**).

Disclaimer:

This document may only be used for the purpose for which it was commissioned and in accordance with the contract between Herron Todd White Environmental Pty Ltd and BMC. The scope of services was defined in consultation with BMC by time and budgetary constraints imposed by the client, and the availability of reports and other data on the subject area. Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information.

Herron Todd White (Environmental) Pty Ltd accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting material by any third party. Information provided is not intended to be a substitute for site specific assessment or legal advice in relation to any matter. Unauthorised use of this report in any form is prohibited.



Table of Contents

1	Executive Summary	4
2	Project, Approval and Offset Details	4
2.1	Offset Area Description	6
2.2	Management Outcomes for the Offset Area	7
3	Photo Monitoring – May 2016	16
3.1	General Observations	16
3.2	Non-compliances	16
3.3	Risks and Threats	16
	Appendix A1: Biocondition Sites Photos	17
	Appendix A2: Other Photos	17
	Appendix B: Landholder Records	20

DRAFT



1 EXECUTIVE SUMMARY

The South Walker Creek Coal Mine (**SWC Mine**) is located in the Bowen Basin region of Queensland, approximately 125km south-west of Mackay (refer **Figure 1**). It is owned by BHP Billiton Mitsui Coal Pty Ltd (**BMC**). As part of the approval of two key projects, being Kemmis II (**K2**) and Mulgrave Resource Access (**MRA**), offset obligations relating to impacts to Matters of National Environmental Significance (**MNES**) were imposed by the Department of Environment (**DoE**) via the two Environmental Approvals dated 16 January 2015 (EPBC 2013/7025 for K2 and EPBC 2014/7272 for MRA). The approval for K2 was subsequently amended in the "Variation to Conditions Attached to Approval – Kemmis 2, South Walker Creek Coal Mine (EPBC 2013/7025)" dated 26 August 2015. The varied approval acknowledges that the K2 project will be undertaken in two stages. The K2 approval requires that the proponent offset the loss of 13.2ha of the Threatened Ecological Community (**TEC**) *Acacia harpophylla* (Brigalow) dominant and co-dominant ecological community, and the loss of 31.7ha of the TEC *Natural Grasslands of the Queensland Central Highlands and the Northern Fitzroy Basin*. The approval for the MRA project requires that the proponent offset the loss of 59ha of the brigalow TEC, which includes habitat for the Ornamental Snake (*Denisonia maculata*) which is a listed threatened species under the *Environmental Protection and Biodiversity Conservation Act 1999* (**EPBC Act**).

The offsets to satisfy the obligation for the K2 project as per the approval are located on Dabin Holdings, a rural property owned by BMC. Dabin Holdings is a heavily vegetated property that lies approximately 45km north of Moranbah and 68km west of Nebo within the Isaac Regional Council area in Central Queensland (see **Figure 1**). As part of the approval conditions, BMC is required to develop and implement a monitoring program and a process to review and report on the progress of the offset plan. These monitoring and reporting requirements are detailed in the *Biodiversity Offset Management Plan for Kemmis II Project and Mulgrave Resource Access Project* (BMC, August 2015) and the *Offset Area Management Plan for Kemmis II Project and Mulgrave Resource Access Project* (BMC, August 2015) (**OAMP**).

The offset to satisfy the obligation for impacts to the brigalow TEC for the MRA project as per the approval is also located on Dabin Holdings. The offset to satisfy the obligation for the impact to the habitat for ornamental snake for the MRA project is located on a separate property, being a third party owned property called Zamia Creek, situated on the Dawson Highway approximately 70km west of Moura and 10km east of Bauhinia within the Central Highlands Regional Council area in Central Queensland (see **Figure 1**). As part of the approval conditions, BMC is required to develop and implement a monitoring program and a process to review and report on the progress of the offset plan. These monitoring and reporting requirements are detailed in the *Biodiversity Offset Management Plan for Kemmis II Project and Mulgrave Resource Access Project* (BMC, August 2015) and the *Offset Area Management Plan for Mulgrave Expansion Project- Zamia Creek (North Section)* (Earthtrade, June 2015) (**OAMP**).

This document forms the biennial photopoint report, as per the reporting schedule detailed in both of the OAMPs, and reports on the progress against the management outcomes described in each of the OAMPs.

2 PROJECT, APPROVAL AND OFFSET DETAILS

The details of the project, approval, and details of the offsets located on Dabin Holdings are shown below in **Table 1A** and those relating to the offset located on Zamia Creek are shown in **Table 1B**.



Table 1A: Project and offset details – Dabin Holdings offsets

Item	Details
Project Names	Kemmis 2, South Walker Creek Coal Mine, Bowen Basin, Qld (K2) South Walker Creek Mulgrave Pit Extension, near Nebo, Queensland (MRA)
Project Location	Approximately 125km south-west of Mackay, Qld
EPBC Approval number	K2 - 2013/7025 MRA – 2014/7272
Approved Action	K2: <i>“To develop a new open cut mining pit within the boundaries of Mine Lease 4750 located approximately 25km west-south-west of Nebo, Queensland in the Bowen Basin”</i> MRA: <i>“To continue mining at the existing South Walker Creek Mine through a further development of the existing Mulgrave open cut pit, 25km west-south-west of Nebo, Queensland in the Bowen Basin”</i>
Approval Holder	BHP Billiton Mitsui Coal Pty Ltd
Approval Holder ABN	34 009 713 875
Offset Location - address	Dabin Holdings 8595 Suttor Developmental Road, Burton, Qld, 4742
Lot/Plan	Lot 2 SP214117
Offset area (ha)	337.5 ha
Landholder Name	BHP Billiton Mitsui Coal Pty Ltd
Landholder Phone	07 3227 5600
Landholder Postal address	GPO Box 1389, Brisbane, Qld, 4001
Land Manager (Lessee) Name	David Wright
Land Manager (Lessee) Phone	0418 196 062
Land Manager (Lessee) Postal Address	PO Box 1934, Mackay, Qld, 4740
Lessee Email	mtspencer@netspace.net.au



Table 1B: Project and offset details – Zamia Creek offsets

Item	Details
Project Names	South Walker Creek Mulgrave Pit Extension, near Nebo, Queensland (MRA)
Project Location	Approximately 125km south-west of Mackay, Qld
EPBC Approval number	2014/7272
Approved Action	<i>“To continue mining at the existing South Walker Creek Mine through a further development of the existing Mulgrave open cut pit, 25km west-south-west of Nebo, Queensland in the Bowen Basin”</i>
Approval Holder	BHP Billiton Mitsui Coal Pty Ltd
Approval Holder ABN	34 009 713 875
Offset Location - address	Zamia Creek (North Section) 24947 Dawson Highway, Bauhinia, Qld, 4718
Lot/Plan	Lot BH194
Offset area (ha)	24.8 ha
Landholder Name	Woorabinda Aboriginal Shire Council
Landholder Phone	07 4925 9800
Landholder Postal address	c/o Post Office, Woorabinda, Qld, 4713
Land Manager	Woorabinda Aboriginal Shire Council
Land Manager	07 4925 9800
Land Manager Postal address	c/o Post Office, Woorabinda, Qld, 4713
Land Manager Email	ceo@woorabinda.qld.gov.au

2.1 Offset Area Description

2.1.1 Dabin Holdings

Dabin Holdings is located north west of Nebo, and the offset areas are located in the eastern section of the holding (see **Figure 2**). The area is sub-tropical with a sub-humid climate that has hot wet seasons and cool dry seasons with a high degree of variability. Mean annual rainfall at Dabin Holdings is around 600 mm and is received mostly between November and April. About a quarter of this is received in the remaining months (*Royal Geographical Society of Queensland, 2009*).

The predominant land use on the offset site is low-intensity cattle grazing. Historically the grazing of cattle has dominated land use within the region. The offset area on Dabin Holdings is a heavily vegetated area, being 100% remnant vegetation. The offset area comprises of areas mapped as either regional ecosystem (**RE**)



11.9.5 or 11.3.1. Vegetation is part of a large vegetation corridor to the north and west. All of the vegetation is over 15 years of age with the majority of the area containing vegetation in excess of 25 years and the vegetation is in good condition.

2.1.2 Zamia Creek

Lot 9 BH194, known as the Zamia Creek property (north section), is located on the northern side of the Dawson Highway and situated on and to the east of Zamia Creek. The property is characterised by floodplain coolabah, floodplain eucalypt woodland, with brigalow - bauhinia regrowth, brigalow - blackbutt and stands of remnant brigalow. Zamia Creek, which forms the western boundary of the property, supports a diverse range of foraging habitats due to the creek containing a well vegetated riparian corridor including tall treed canopy layer, tall shrub layer and ground cover including native grasses and leaf litter layer. The area contains large tracts of treed areas, with decorticated bark and tree hollows. These resources provide suitable roosting/breeding resources and breeding habitat resources, for a number of species.

The historical land use of the property has been cattle grazing. The offset area is located adjacent to the Zamia Creek Conservation Park and is shown at **Figure 3**.

2.2 Management Objectives for the Offset Area

2.2.1 Dabin Holdings

The OAMP for the offset areas on Dabin Holdings describes the specific management objectives for the offset area, and are shown below:

The management objective of the environmental offsets for MRA and K2 is:

To conserve and enhance the environmental values of the threatened ecological communities over the long term, by working to increase the extent of both remnant and regrowth vegetation and improving its condition and management.

The management area objective is estimated to be achieved within 20 years, but ecological benefit is expected to occur within 5-10 years. It is recognised that the timeframes are subject to natural environmental and climatic conditions while unexpected events and other potential risks are also identified in Section 7.0; Risks and Risk Management of the OAMP.

The management objective will be considered to have been delivered if the Specific Management Outcomes have been achieved.

2.2.2 Zamia Creek

The OAMP for the offset area on Zamia Creek describes the specific management objectives for the offset area and are shown below:

The management area objectives are to protect and to improve the habitat conditions for the listed threatened species Denisonia maculata (ornamental snake). Management actions will enable the natural regeneration of the habitat via weed control, fire management, management of livestock, pest animal management and restrictions on access within the Offset Areas to meet the offset requirements of the Approval Conditions EPBC 2014/7272 for the Mulgrave Pit Expansion Project, South Walker Creek Mine.

A legally binding mechanism, in the form of a Voluntary Declaration under the Vegetation Management Act 1999 (Qld) will protect this vegetation and associated habitat from clearing and require the actions within this management plan to be implemented. The areas will be actively managed until 30 June 2030.

The schedule of specific management actions to meet the outcomes for the offsets on each property are detailed in each of the OAMPs, and are shown below in **Table 2A** (Dabin Holdings brigalow offset area), **Table 2B** (Dabin Holdings grasslands offset area) and **Table 2C** (Zamia Creek ornamental snake offset area). The last column in each table reports on the progress of each management action to date.



Figure 1: Locality Map



Figure 2: Dabin Holdings – Offset Area

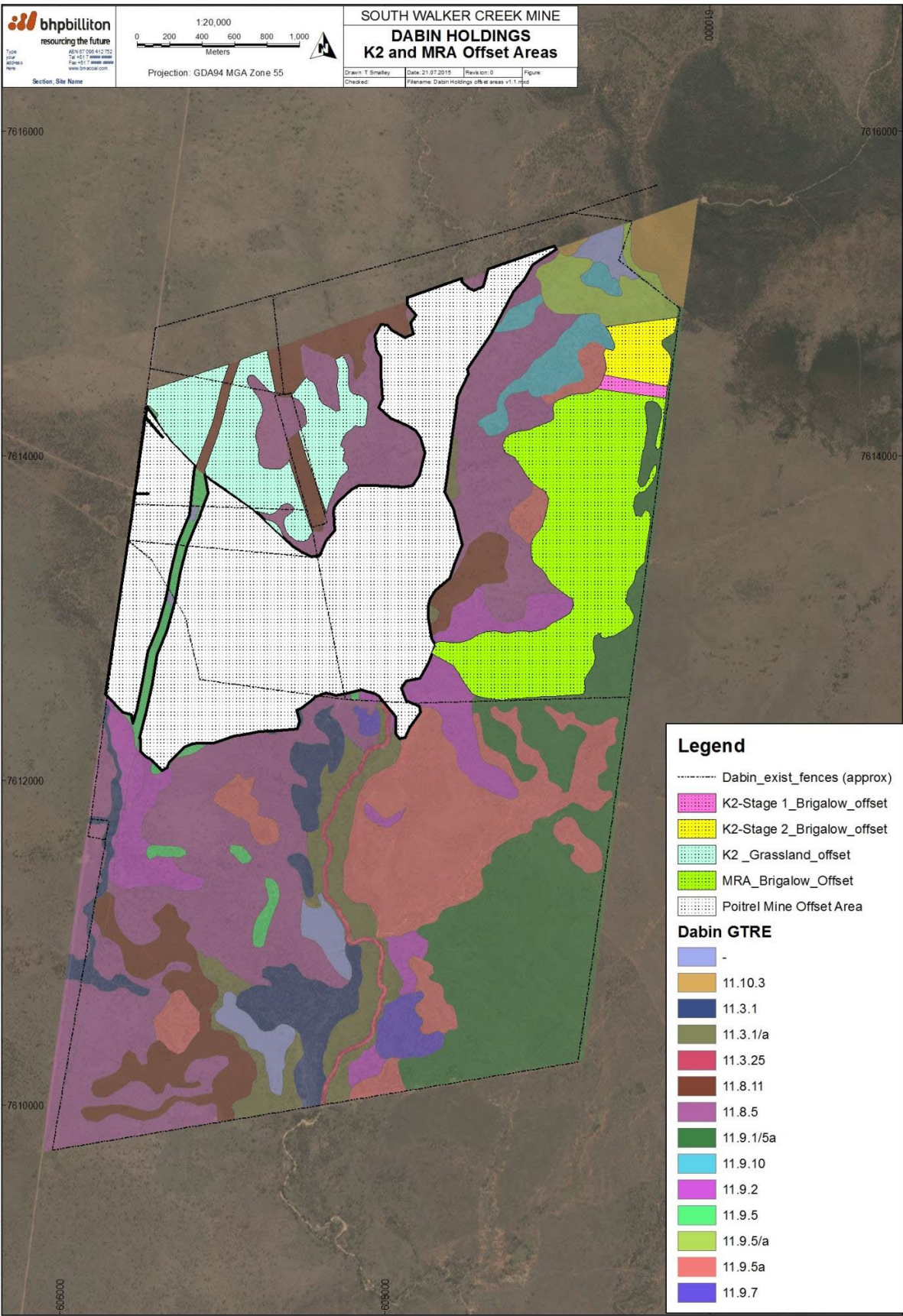


Figure 3: Zamia Creek – Offset Area

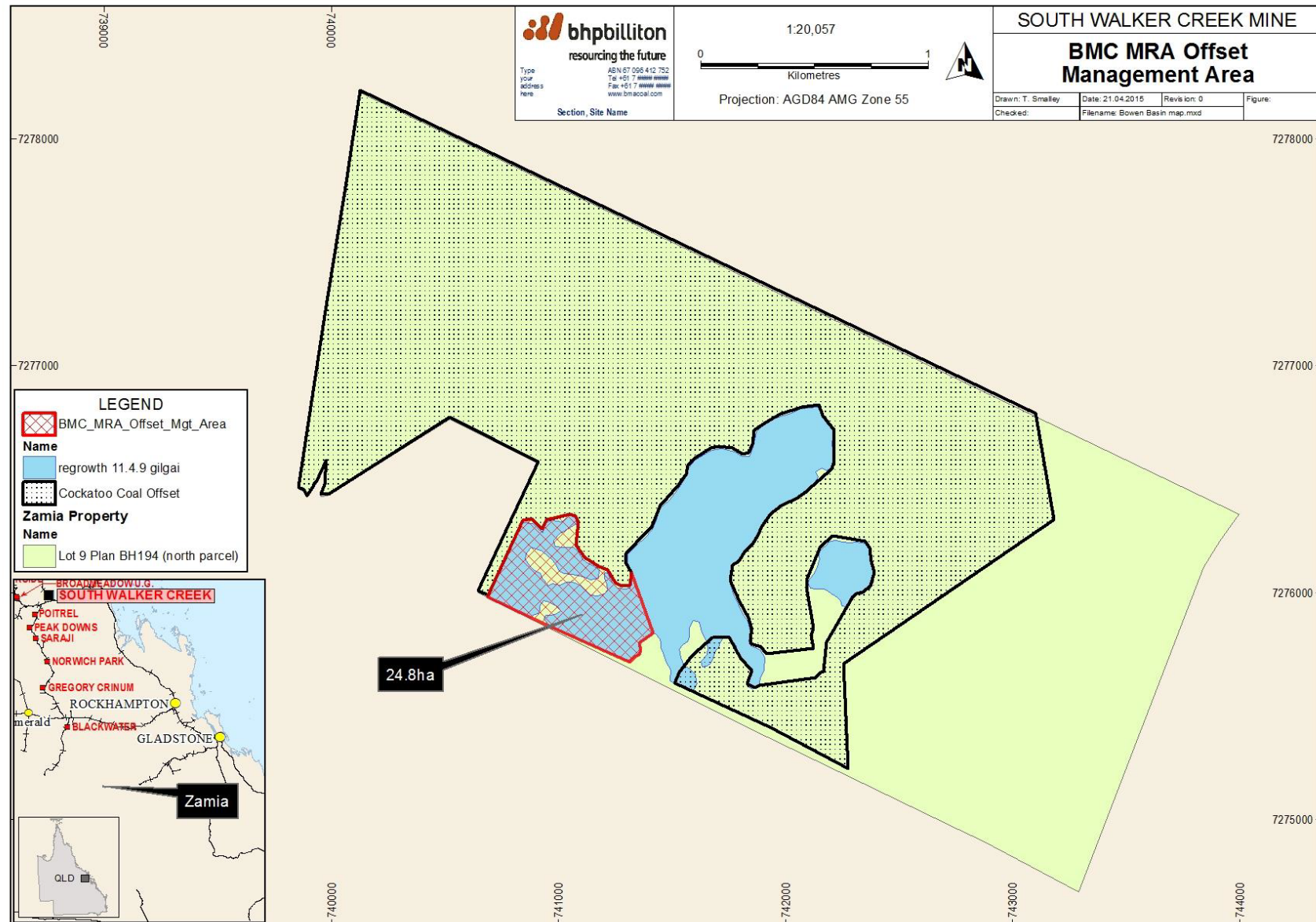


Table 2: Schedule of Management Actions for the Offset Area

Management Activity	Performance Objectives	Where, when and how the activity will be carried out	Who will be carrying out the activity	Monitoring method	Reporting	Progress Report
Limiting disturbance	The extent and condition of Brigalow TEC will be maintained or increased between each successive BioCondition assessment.	Disturbance to vegetation within the offset is not permitted, except for maintenance of vegetation for: existing roads, firebreaks, easements and fencing. New firebreaks or fencing if required should be installed outside of the perimeter of the Brigalow community. Thinning of Brigalow to manage dense Brigalow regrowth (to promote rapid recovery of stunted Brigalow stands) may occur where canopy is >70%, stem count is >10,000 / ha, and recommended by a qualified ecologist. Ground disturbance (i.e ploughing) is not permitted. Removal of groundcover and organic litter is not permitted. Vehicle and machinery movement through the offset area is to be minimised. Deliberate introduction of non-endemic species is not permitted. The use of fertilisers on the property at locations where it could move into the offset area is to be avoided.	Landowner / Land manager	All activities will be monitored through - routine inspections by the landholder and or agistee. - Landowner to develop a basic checklist for observations or actions relevant to managing the offset, including - weather conditions, - grazing intensity and stock rotation - pasture management activities such as seeding or fertilising, - pest and weed occurrence/ intensity and management activities, - erosion issues and any control works - incidents of fire and description - general property management activities such as fencing		
Grazing management	An improvement in the site condition and species stocking rate scores between each successive BioCondition assessment. Natural regeneration of Brigalow species will be recorded at each Biocondition Assessment.	The Landowner may graze stock in the Brigalow area in the following manner: - to occur primarily for the purpose of minimising the fuel load and risk of hot fire burn. - stock are to be carried at similar stocking densities to that historically carried on the property, however the duration of grazing within the Brigalow areas is to be reduced commensurate with fuel load present, such that grazing may be more intense if the Brigalow stem count exceeds 10,000/ha. - grazing intensity should be reduced during the wet season. - cattle should not be moved into the Brigalow area if they have come from a grazing area known to contain weed species that are seeding, until the fodder has passed through their systems. - stock will be excluded from the Brigalow offset area during periods of drought. The grazing regime is to be carried out for the life of the Offset Area Management Plan. The presence and abundance of native herbivores will be noted by the land manager and if abundance is deemed to be excessive then the landowner will encourage those species to move to other non-offset areas via noise, human activity or other nuisances.	Landowner / Land manager			

Management Activity	Performance Objectives	Where, when and how the activity will be carried out	Who will be carrying out the activity	Monitoring method	Reporting	Progress Report
Weed Management	Keep weed cover at or below baseline levels as determined by BioCondition surveys.	An initial weed spraying program will occur within the first 6 months of offset establishment. This will specifically target any small populations of Buffel grass or Parthenium that may be present. Thereafter the Landowner will undertake regular assessments for weed development. Should any weeds become established then additional weed control will be undertaken as early as practicable considering climatic conditions. The presence of foreign perennial weeds will be kept below 5% ground cover. Cattle should not be moved into the Brigalow area if they have come from a grazing area known to contain weed species that are seeding, until the fodder has passed through their systems.	Landowner / Land manager	• checklist to be completed quarterly by land manager. • ongoing interactions between BMC & the landholder including landholder records and anecdotal discussions.		
Pest animal management	Occurrence of pest animals is at or below levels estimated at commencement through baseline assessments.	Wild pigs pose the greatest risk to the improvement of the Brigalow offset area. Should the presence of pigs be noticed during the quarterly checklist, a pig eradication program shall be implemented within the Offset Area in accordance with the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> . A similar program could be implemented if other pest animals become a noticeable problem. Where possible, native pest animals should be encouraged to move outside of the offset area through disturbance and nuisance activities such as noise and human presence. Anecdotal evidence (eg photos, written records) of pest animal presence and abundance should be collected.	Landowner / Land manager	• Biennial photopoint monitoring for first 2 years, then annually for next 5 years, then biannually for remaining duration of offset. • 5 yearly Biocondition monitoring		
Fire management	Maintenance of appropriate controls to enhance biodiversity and reduce fuel loads. The occurrence of any fire in the offset area will be recorded. Biocondition assessments will make a determination of impact resulting from any fire. Allow the accumulation of fallen timber/debris and the establishment of natural undergrowth. Biocondition Assessments will be used to measure this.	Fire management is a key item in the threat abatement plan. To the extent practicable, fire is to be excluded from the Brigalow TEC Offset Area, except for ecological burns. A low intensity fire may be permitted at intervals greater than 7 years for ecological purposes if recommended by a qualified ecologist. Within 12 months from the date of this Offset Area Management Plan coming into effect a member of the Rural Fire Service Brigade (RFSB) inspect the offset area to assess the suitability of the current and proposed firebreaks. Any recommendation for improvement will be implemented within 6 months from receipt of those recommendations, provided they do not contradict this OAMP. Stock may be grazed in the Offset Area to assist in fuel reduction.				



Management Activity	Performance Objectives	Where, when and how the activity will be carried out	Who will be carrying out the activity	Monitoring method	Reporting	Progress Report
Fire Management	The Landowner within 12 months from the date of this Offset Area Management Plan coming into effect will request to have a suitably qualified member of the Rural Fire Service Brigade (RFSB) assess the suitability of the current and proposed firebreaks and, where recommended by the RFSB, will implement those recommendations within 6 months from receipt of those recommendations. Stock will be grazed in the Offset Area for fuel reduction purposes. The Landowner is to ensure that the Offset Area does not become over grazed or degraded.	The Landowner must within 12 months from the date of this Offset Area Management Plan coming into effect have a member of the Rural Fire Service Brigade (RFSB) attend and within 6 months from receipt of any RFSB recommendations, implement those recommendations. The Landowner is not to graze stock for any longer than two (2) months at a time and no more than three times per year except if an exemption applies under section 6 of the Offset Area Management Plan.	The Landowner must within 12 months from the date of this Offset Area Management Plan coming into effect have a member of the Rural Fire Service Brigade (RFSB) attend and within 6 months from receipt of any RFSB recommendations, implement those recommendations. The Landowner is not to graze stock for any longer than two (2) months at a time and no more than three times per year except if an exemption applies under section 6 of the Offset Area Management Plan.	Biennial photo point monitoring in the Offset Area. Then Biocondition monitoring every 5 years starting at year 5.	Photo point reporting is to be undertaken by BMC biennially. Biocondition reports are to be submitted for the every 5 years starting at year 5.	Firebreaks around this and other offset areas on the property are largely co-located with access tracks and boundary and internal fencing lines. The land manager (lessee) has undertaken firebreak maintenance during April 2016. This maintenance involves the slashing of the firebreak areas, in preference to the use of a grader or dozer blade, as these methods are more likely to result in surface erosion. Please refer to the photos shown at Appendix A2. The current land manager (lessee) is in the process of arranging a site inspection by a member of the local branch of the Queensland Rural Fire Service (QRFS) to obtain an assessment of the suitability of the firebreaks. This will be completed by the end of June 2016. Photo point monitoring was conducted on 13th May 2016 (refer to Appendix A1) at each of the biocondition locations.
Restricted Access	Access is strictly controlled, available to	Offset Area	Landowner or lessee of	N/A	N/A	N/A



Management Activity	Performance Objectives	Where, when and how the activity will be carried out	Who will be carrying out the activity	Monitoring method	Reporting	Progress Report
	only the landholder and employees as required.		landowner (subject to negotiations)			
Erosion and Sediment Control	Minimise erosion caused by stock and ensure the ground maintains stability	The Landowner is to monitor the effects of stock grazing and is to ensuring that there is always off stream watering points available for any stock in the area. If the landowner notices that the land is eroding, then the Landowner is to exclude or remove the stock from the affected area until such time as the conditions are more desirable to enable grazing stock to return to the area without adversely impacting on the ground. The Landowner is to take all reasonable and appropriate action to remedy any erosion caused by stock.	Landowner	Biennial photo point monitoring in the Offset Area. Then Biocondition monitoring every 5 years starting at year 5.	Photo point reporting is to be undertaken by BMC biennially. Biocondition reports are to be submitted for the every 5 years starting at year 5.	Regular assessments of the level of erosion throughout the offset area have been made by the land manager (lessee) since the commencement of the lease with the landowner. These are undertaken during regular inspections of the property. Off stream watering points are provided, and firebreaks have been maintained through slashing rather than the use of a blade. These measures have assisted in the minimisation of erosion across the offset area. Photos of ground cover at the biocondition locations are shown at Appendix A2 . Photo point monitoring was conducted on 13 th May 2016 (refer to Appendix A1) at each of the biocondition locations.
Biodiversity Enhancement	Allow the accumulation of fallen timber/debris and the establishment of natural undergrowth. The activity is to be carried out by not removing the fallen timber/debris from the Offset Area.	The accumulation of fallen timber/debris is to occur throughout the Offset Area.	Landowner or lessee of the landowner	Biennial photo point monitoring in the Offset Area. Then Biocondition monitoring every 5 years starting at year 5.	Photo point reporting is to be undertaken by BMC biennially. Biocondition reports are to be submitted for the every 5 years starting at year 5.	No fallen timber or debris has been removed from the offset area, thereby allowing it to accumulate, which is expected to enhance the biodiversity of the offset area. Photo point monitoring was conducted on 13 th May 2016 (refer to Appendix A1) at each of the biocondition locations. Photos of ground cover at the biocondition locations are shown at Appendix A2 .
Livestock Management	Stock will be grazed in the Offset Area for fuel reduction purposes only.	The Landowner is to graze stock in the following manner. There are no set stocking rates or times throughout the year where stock are to be permitted to graze. The Landowner is not to graze stock for any longer than two (2) months at a time and no more than three times per year except if an exemption applies under section 6 of the Offset Area Management Plan.	Landowner or lessee of the landowner	The Landowner must keep the Landowner Records as detailed in Section 7 of the Offset Area Management Plan.	Photo point reporting is to be undertaken by BMC biennially. Biocondition reports are to be submitted for the every 5 years starting at year 5	This offset area overlays part of three separate paddocks, being "Top Skull Paddock", "Wards Paddock" and the "Mailbox Paddock". A mob of xxx cattle were removed from "Top Skull Paddock" on 4 th April 2016 following a 10 month grazing period.



DRAFT



3 PHOTO MONITORING – MAY 2016

The latest series of photo monitoring was undertaken on 13th May 2016, at each of the four biocondition locations within the offset area, as shown at **Figure 2**. Photos were taken in a north, east, south and west direction (see **Appendix A1**). Photos showing the level of ground cover at each location were also taken, as shown at **Appendix A2**. Additional photos showing firebreaks are also shown at **Appendix A2**.

3.1 General Observations

A number of general observations were made during the site visit. Firstly, much of the district is very dry, after a drier and hotter wet season than average (see the rainfall records at **Appendix B**). However, the conservative level of grazing across the property has ensured that there is still a good quantity of grass present, and a good level of ground cover.

The general level of weed presence is also good, with some higher levels of weed presence at the occasional pressure point such as gateways and off-stream watering points, where livestock traffic is more concentrated. Across the entire offset area, the weed cover was estimated to be less than 5%.

No areas of significant erosion were seen during the inspection. The maintenance of firebreaks is done via slashing means rather than scraping with a grader or blade, which has prevented any erosion in these areas. The light stocking rate of livestock that has been employed across the property has also assisted in this regard.

Fencing around and within the property is well maintained throughout in a stockproof condition. It is noted that a section of the northern boundary fence of the eastern portion of Dabin Holdings appears to be sited north of the actual cadastral boundary. It is understood that this is currently a matter being discussed between the owner of Dabin Holdings and the neighbouring property owner.

3.2 Non-compliances

No non-compliances with the schedule of management actions relating to the offset area were identified at the time of the site visit in May 2016.

3.3 Risks and Threats

3.3.1 Existing risks and threats

None of the threats and potential risks identified in the OAMP have impacted on the offset area beyond the stated criteria.

3.3.2 New risks and threats

No new risks or threats to the offset area were identified at the time of the site visit in May 2016.



APPENDIX A1: BIOCONDITION SITES PHOTOS

APPENDIX A2: OTHER PHOTOS

DRAFT



DRAFT



APPENDIX B: LANDHOLDER RECORDS

DRAFT

