

File No: 65-43-881-03
RDC-1252717ROTORUA LAKES COUNCILMayor
Chair and Members
STRATEGY, POLICY AND FINANCE COMMITTEE**PROPOSAL FOR THE REVOCATION AND DISPOSAL OF IDENTIFIED RESERVES FOR HOUSING****Report prepared by:** Stephanie Kelly, Senior Strategy Advisor, District Development**Report reviewed by:** Jean-Paul Gaston, Deputy Chief Executive District Development**Report approved by:** Geoff Williams, Chief Executive

**1. TE PŪTAKE
PURPOSE**

The purpose of this report is for the Committee to consider and make a recommendation to Council on the proposal to revoke the status of identified Council reserves, or parts of reserves, for housing.

The report details a two-step process where local feedback will be used to inform a decision on the reserves for revocation and disposal and the legal mechanism for that to occur.

**2. TE TUHINGA WHAKARĀPOPOTOTANGA
EXECUTIVE SUMMARY**

The Open Space Level of Service Policy outlines Council's approach to the provision and development of the open space network including determining open space requirements for new development areas and providing a framework for assessing the suitability of existing open space.

Assessment of the open space network against the Policy has identified a number of Council's existing reserves that do not meet the objectives of the Open Space Policy and where disposal of those reserves, in full or in part, would improve open space outcomes. Disposal of the reserves would first require the classification of the reserve to be revoked.

Rotorua is also facing a housing crisis and disposal of the identified reserves also presents an opportunity to achieve housing outcomes.

The standard process under the Reserves Act 1977 for revoking the classification of a reserve is lengthy typically taking two years or more. It is recommended that a local Bill process be used to revoke the classification of the identified reserves.

Prior to making a decision to commence a Local Bill process, it is proposed to undertake consultation and invite written feedback from neighbouring residents of the identified reserves and the wider community. The feedback received would then be used to inform Council's decision on whether to proceed with the proposal.

Kāinga Ora has committed to developing additional homes in Rotorua if appropriate sites are available and has expressed an initial interest in acquiring six of the identified reserves through a direct sale.

3. HE TŪTOHUNGA RECOMMENDATION

1. That the report 'Proposal for the revocation and disposal of identified reserves for housing' be received.
2. That the Committee notes that the reserves or part reserves for possible revocation and disposal have been identified using the levels of service identified in the Council's approved Open Spaces Level of Service Policy and the following criteria:
 - There is excess reserve provision in the area;
 - There is no clear purpose for or function of the reserve;
 - The size of reserve significantly exceeds the minimum size identified in the Open Spaces Level of Service Policy and could be reduced without compromising recreation or open space values;
 - The provision of housing on part of the reserve would improve the safety and use of the reserve;
 - There are no viable options to improve the reserve to meet level of service standard.
3. That the Committee notes the significant housing deficit that exists in the Rotorua urban area (identified in the Housing and Business Capacity Assessment (HBA)), the below average number of transitional and public homes available in Rotorua and significant emergency housing problems.
4. That the Committee recommends to Council that consultation with neighbours of all reserves proposed and the wider community be undertaken through the distribution of a Statement of Proposal (SOP) document inviting written feedback, for a period of 4 weeks, on the proposals detailed below. That the feedback be used to inform Council's decisions on:
 - Whether or not to proceed with the revocation and disposal of any reserve or part reserve
 - The legal method for revocation and disposal (i.e. Local Bill or existing Reserves Act process);
 - The reserves to be developed or enhanced with funds received from the proceeds of the disposal;
 - Any conditions to be applied to housing development by the purchaser.
5. That the Committee recommends to Council that the following reserves (two full reserves and eight parts of reserves) be proposed for revocation and disposal in the Statement of Proposal:
 - Lee Road Reserve
 - Coulter Road Reserve (part only)
 - High Street Reserve (part only)
 - Glenholme Reserve - 117 Clinkard Avenue (part only)
 - Gallagher Street Reserve
 - Linton Park West – 16 Kamahi Road (part only)

- Wrigley Road Reserve (part only)
- Turner Drive Reserve (part only)
- Park Road Reserve (part only)
- Steeles Lane Reserve (part only)

6. That the Committee recommends to Council that the Statement of Proposal identify in-principle the preferred legal method for revocation and disposal of reserves be through a Local Bill and notes that all proceeds of land sales will be re-invested in improvements to existing reserves or the purchase of new reserves.
7. That the Committee recommends to Council that it includes within the Statement of Proposal, that it supports in-principle, a direct sale to Kāinga Ora of the following reserves (or parts of Reserves):
- Lee Road Reserve
 - Coulter Road Reserve (part only)
 - High Street Reserve (part only)
 - Glenholme Reserve - 117 Clinkard Avenue (part only)
 - Turner Drive Reserve (part only)
 - Steeles Lane Reserve (part only)

And that the sale of those reserves to Kāinga Ora be conditional on:

- a. Kāinga Ora and Council reaching agreement on the value of the identified sites; and
 - b. Kāinga Ora committing to providing mixed model housing developments that includes a mix of social housing and progressive home ownership models and market sale; and
 - c. Kāinga Ora committing to delivering housing on the identified sites within two years.
8. That the Committee recommends to Council that remaining identified reserves (or parts of reserves) be sold via market sale or directly to a community housing provider where appropriate, conditional on the purchaser committing to delivering housing within two years.

4. TE TĀHUUH BACKGROUND

Open Space Policy & Needs

In April 2021, Council adopted the Open Space Level of Service Policy, following a formal public submission and hearing process. The purpose of the Policy is to inform open space requirements in new development areas and provide a framework for assessing the suitability of Councils existing open space network. This means ensuring that the Rotorua community has access to quality open space that provides a variety of recreation experiences, and that the open space network is the result of good design and is highly valued by the community.

The Rotorua District has more than 370 individual reserves, and approximately 1500 hectares of managed open space. While we are fortunate in that we have a large amount of open space providing a diverse range of experiences, the quality and accessibility of the open space network is variable.

Assessed against modern design standards these fall short with no road frontage, minimal visibility and significant CPTED (Crime Prevention Through Environmental Design) issues. There are reserves that have no clear purpose or function or are being used for an activity that does not align with the purpose of a reserve. In some areas we have a significant oversupply of reserve land due to the historic use of those reserves as sportsfields before Rotorua moved to a more centralised sportsfield model, and in other areas, particularly within the central area, there is limited or no provision of open space.

Assessment of the open space network against the Policy has identified a number of reserves that do not align with objectives of the Policy and where disposal of the reserve, in part or full, would achieve a better open space outcome. This includes increasing use, safety and access to the reserve network, and freeing up capital for re-investment into existing reserves to improve quality and increase recreation opportunities. At its meeting of 28 October 2021, Council considered a proposal to revoke the classification of the identified reserves (or parts of reserves). Council did not make a final decision at that time but did give unanimous 'in-principle' support to staff to begin due diligence processes.

Council's in-principle approval was subject to Council staff undertaking further work. This included additional assessment of the identified sites and consideration of the preferred legal mechanism for the revocation and disposal of the identified sites.

The need for houses

With Housing being the most critical issue currently facing the Rotorua community, disposal of the identified reserves in part or full could enable the development of additional housing and increased housing choice for our community.

Council's Housing and Business Capacity Assessment has identified a current deficit of approximately 1,500 homes in the Rotorua district. Across New Zealand, public housing equates to approximately 4% of all housing stock compared to only 2% in Rotorua. Approximately 750 additional public houses would be required to simply meet the national average. This does not recognise high levels of deprivation that exist in our community. Housing challenges are compounded by a shortage of other housing types including affordable rentals, first homebuyers and progressive home ownership models and market housing.

Further, Rotorua has a disproportionate number of larger three and four bedroom homes and a limited supply of smaller dwellings. With the population of Rotorua aging and families getting smaller, significant demand for smaller household types (one and two bedrooms) is expected during the next 10 years.

Council has worked closely with the Ministry of Housing and Urban Development (MHUD) to identify the scale of the housing deficit and planning and infrastructure investment options to address housing supply in the medium to longer-term. This work has resulted in the Rotorua Lakes Council being included with tier 1 Council's in adopting the medium density residential standards and the successful inclusion of Rotorua's storm water infrastructure investment project for the western and central areas of the city, totalling \$99m, in the final negotiation phase of the Infrastructure Acceleration Fund (IAF). This follows a previous funding allocation of \$55m from the Crown Infrastructure Partners (CIP) Fund for roading and storm water infrastructure to support residential development in the eastside of Rotorua.

Recognition of Rotorua's dire housing situation led to the formation of the Housing Taskforce in 2021 and the contracting (consenting process underway) of 13 motels for whānau needing emergency housing. The Te Pokapu – hub which has recently opened as a result of the taskforce, provides direct processing and support to clients needing emergency housing.

Housing Minister Megan Woods also encouraged Kāinga Ora to proceed as quickly as possible with the development of public homes in Rotorua and the Kāinga Ora pipeline is increasing.

Minister Woods asked Council to examine its land holdings to determine whether there were any opportunities to create further public and affordable housing more quickly and Kāinga Ora has indicated its willingness to provide more public homes in Rotorua if suitable land is available.

The availability of public homes in Rotorua will directly impact on the requirements for using motels for emergency housing.

5. TE MATAPAKI ME NGĀ KŌWHIRINGA DISCUSSION AND OPTIONS

5.1 Reserves (or parts of reserves) identified for revocation and disposal

13 reserves and land lots were originally identified as not aligning within Council's Open Space Level of Service Policy and were subsequently approved in-principle by Council to be considered for disposal. This meant identifying reserves that met one or more of the following criteria:

- There is excess reserve provision in the area;
- There is no clear purpose or function of the reserve;
- The size of reserve significantly exceeds the minimum size identified in the Policy and could be reduced without compromising recreation or open space values;
- The provision of housing on part of the reserve would improve the safety and use of the reserve;
- There is no viable options to improve the reserve to meet level of service standard.

Five sites have since been removed from the list following further investigation and due diligence including engagement with mana whenua and an additional two reserves (or parts of reserves) have been identified.

Ten reserves (two full reserves and eight parts of reserves) are subsequently proposed for permanent disposal, following the revocation of the reserve status. The total reserve land proposed for disposal equates to approximately 9.5 hectares or 0.6% of Council's overall reserve network.

A large number of Council's assets within the open space network (e.g. playgrounds) are aging and in some instances no longer meet required safety standards or the expectations of our community. The disposal of the identified reserves would enable the proceeds of sale of these sites to be reinvested back into the open space network, improving overall quality and providing greater recreation opportunities for our community. Council staff would work with individual communities to understand their aspirations for their reserves and to inform the best use of any proceeds from the disposal of these sites.

Information on each identified reserve, including existing use, issues and opportunities is provided below. The reserves have been grouped to provide an open space network view of each area. Further information of the land status and acquisition history of each reserve is included in **Attachment 4**.

Eastern Area

The Eastern area of Rotorua has a high provision of quality open space that provides a range of recreational opportunities including play, sport and lake access and the community has access to more than one neighbourhood reserve (or equivalent) within 500m of their properties.

Two reserves within the Eastern area do not meet the objectives of the Open Spaces Policy. Further information and maps on the reserve network within the Eastern area and the reserves proposed for disposal are included as **Attachment 1**.

1. Lee Road Reserve

- Large open grass space that has no clear purpose or function.
- Not usable much of the year due to drainage issues
- Significant reserve provision within the wider area with Waikawau/Hannahs Bay Reserve and Waingaehe Reserve located within 400 metres. Both of these reserves are high quality open spaces that provide a range of recreation opportunities and are highly valued by the community.
- Disposal of this site would enable capital investment into Waikawau/Hannahs Bay Reserve to deliver on the actions of the Reserve Management Plan which was adopted in 2020.

2. Coulter Road Reserve (part only)

- CPTED issues due to poorly designed open space with no road frontage and minimal visibility into the reserve
- Reports of vandalism from the Kōhanga Reo located on the reserve and ongoing antisocial behaviour
- Reserve includes an aging playground that is nearing the end of its life
- Disposal of part of the reserve for housing would improve passive surveillance, safety and use of the reserve
- Kōhanga Reo leases part of the reserve (not proposed for disposal) is supportive in principle of the proposal.
- Disposal of this site would enable investment into park facilities including the aging play equipment and a redundant tennis court.

Central Area

The provision of open space within the central area of Rotorua (between the Puarenga and Utuhina streams) is varied. There is a significant under-supply of open space provision in the Glenholme suburb between Ranolf and Fenton Streets. Addressing this will be a challenge and is likely to require the purchase of existing properties or the vesting of land as a result of redevelopment.

The remainder of the Central area, particularly Springfield and the Inner City, have high provision of quality open space and the community has access to more than one neighbourhood reserve (or equivalent) within 500m of their properties.

Three reserves within the Central area do not meet the objectives of the Open Space policy. Further information and maps on the reserve network within the Central area and the reserves proposed for disposal are included as **Attachment 2**.

3. High Street Reserve (part only)

- Significant CPTED issues due to poorly designed open space with no road frontage, minimal visibility into the reserve.
- Size of the reserve limits the ability to improve open space outcomes and resolve safety concerns.
- Frequent and ongoing instances of antisocial behaviour including drug use, broken glass, illegal dumping and rough sleepers.
- Good provision of open space within the wider area.
- Kindergarten leases part of the reserve not proposed for disposal and is supportive of the proposal.
- Reserve includes an aging playground that is nearing the end of its life.
- Disposal of this site would enable investment into the development of play and recreation facilities on Glenholme reserve which is located 250m from High Street Reserve.

4. Glenholme Reserve - 117 Clinkard Reserve (part only)

- Small site (approx 700sqm) adjacent to Glenholme Reserve – previously occupied by a toilet block when Glenholme reserve was used as a sportsfield.
- Frequent issues with illegal dumping, graffiti and vandalism.
- Disposal of this site would not impact on the wider use of Glenholme Reserve.
- Disposal of this site would enable investment into the development of play and recreation facilities on Glenholme reserve.

5. Gallagher Street Reserve

- Large reserve that provides no recreation use or function.
- Reserve is fenced and has been grazed under a lease for more than 15 years.
- Good provision of open space within the wider area.
- Disposal of this site would enable investment into existing sporting facilities and development of esplanade reserves.

Western Area

The Western area of Rotorua has a high provision of quality open space that provides a range of recreational opportunities including play, sport and walking and cycling. The community has access to a more than one neighbourhood reserve (or equivalent) within 500m of their properties.

A number of the reserves within the Western area were previously used as sportsfields before Rotorua moved to a more centralised sportsfield model with the development of Westbrook and Linton Park. The size of these reserves significantly exceeds Council's open space level of service requirements.

Five reserves within the Western area do not meet the objectives of the Open Space policy. Further information and maps on these are included as **Attachment 3**.

6. Linton Park West - 16 Kamahi Road (part only)

- CPTED issues due to poorly designed open space with no road frontage, minimal visibility into the reserve;
- Part of a much larger quality reserve which provides a range of recreation opportunities;
- Frequent instances of illegal dumping, vandalism and antisocial behaviour;
- Disposal of this site would enable investment in Linton Park.

7. Wrigley Road Reserve (part only)

- Significantly sized reserve which provides a range of recreation opportunities.
- Proposal to provide housing on a small part of the reserve was requested by the community association which aims to increase housing and provide more housing choice within the community.
- Housing on part of the reserve would create road frontage and subsequently increase passive surveillance into the reserve and improve safety.
- Disposal of this site would enable investment into additional recreation provision within the Fordlands community.

8. Turner Drive Reserve (part only)

- Significantly sized reserve which provides a range of recreation opportunities (previously used as sportsfield).
- Ongoing and frequent vandalism to playground and redundant toilet block.
- Housing on part of the reserve would improve passive surveillance.
- It is proposed to retain a good provision of open space including existing quality recreation facilities.
- High provision of open space within the wider area.
- Disposal of this site would enable investment into additional recreation provision within the Western Heights community.

9. Park Road Reserve (part only)

- CPTED issues due to poorly designed open space with minimal road frontage and minimal visibility into the reserve.
- Significantly sized reserve which provides a range of recreation opportunities (previously used as sportsfield).
- Ongoing and frequent vandalism to playground.
- Housing on part of the reserve would improve passive surveillance.
- It is proposed to retain a good provision of open space including existing quality recreation facilities.
- High provision of open space within the wider area.
- Disposal of this site would enable investment into additional recreation provision within the Western Heights community.

10. Steeles Lane Reserve (part only)

- Large reserve primarily used to provide access to Western Heights High School.
- Disposal of part of the reserve for housing would not significantly impact on open space or recreation outcomes.
- High provision of open space within the wider area.
- Disposal of this site would enable investment into additional recreation provision within the Western Heights community.

5.2 Recommended process and community consultation

All of the identified reserve sites are classified under the Reserves Act 1977. Disposal of the identified sites first requires the classification of the reserves to be revoked.

There are two viable options for revoking the classification of the reserves:

1. Revocation by Minister of Conservation pursuant to section 24 of the Reserves Act 1977;
2. Change of legislation by way of a local bill.

The process under Section 24 of the Reserves Act includes the following steps:

1. Resolution of Council as the Reserve Administering Body to commence the revocation process;
2. Consultation with the Minister of Conservation;
3. Public notification of the proposal to revoke the reserve status including the reasons for the proposal;
4. Minimum one month consultation process;
5. Council as Reserve Administering Body to consider objections and make a recommendation to the Minister of Conservation;
6. Minister of Conservation decision of proposal to revoke.

The local Bill process involves public notification of the Bill, as well as the hearing of submissions by a select committee. A summary of the process is as follows:

1. The draft bill is submitted to the Parliamentary Counsel Office for review;
2. The Council must publish a notice of intention to pursue the bill in a daily newspaper and on its website and must make the bill available for inspection for 15 working days;
3. The bill is submitted to the Office of the Clerk, with a declaration from the Chief Executive that the public notice requirements have been met;
4. The bill is introduced to the House by a Member of Parliament;
5. The bill receives its first reading, and is referred for consideration by the select committee;
6. Once the select committee's report is available, the bill receives its second and third readings;
7. The bill is then prepared for assent by the Governor General and, once it has received assent, becomes an Act of Parliament.

There are a number of pros and cons for each option as outlined below:

	Reserves Act process	Local Bill
Pros	<ul style="list-style-type: none"> - Council has undertaken this process several times perviously - Enables local community input - Provides Council with greater role in hearing submissions and decision making - Requires the proceeds to be reinvested in the reserve network 	<ul style="list-style-type: none"> - Significantly quicker process (approx. 9 months) - Enables Crown-owned reserves to be vested and disposed of by Council - Enables local community input - Requires the proceeds to be reinvested in the reserve network
Cons	<ul style="list-style-type: none"> - Lengthy process due to operational and decision making processes (approx. 2 years) 	<ul style="list-style-type: none"> - A Local Bill process may be an unfamiliar process to the community

	- Crown-owned reserves would revert back to the Crown, reducing the amount that can be reinvested back into the reserve network	- Select committee hears submissions, rather than Council - Overall decision making sits with central government
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The recommended legal mechanism to enable the revocation and disposal of the identified reserve sites is to progress a local Bill. This would provide the most certainty in terms of speed of process, typically taking nine to 10 months compared to the traditional Reserves Act process which can take up to two years.

A local Bill would need to achieve a number of purposes, including:

1. Vesting all reserves with underlying Crown ownership in Rotorua Lakes Council;
2. Revoking the classification of the reserves;
3. Enabling Council to dispose of the land for housing;
4. Requiring the use of the proceeds from the sale of the land to be used for the purposes of purchasing new reserve land or developing existing reserves.

Prior to commencing a formal process to revoke the classification of the identified reserves, it is proposed to undertake a targeted feedback process. This would include information on the proposal being provided (through a Statement of Proposal) and written feedback being sought from residents within 500m of each identified reserve. The wider community would also have the opportunity to provide written feedback through Council's Kōrero Mai engagement platform.

Feedback received would be collated and presented to Elected Members to inform a decision on whether to commence a formal process to revoke the classification of the identified reserves.

5.3 Housing proposal

It is anticipated there would be significant public interest in the type of housing proposed and in the proposed developer of the identified sites. Therefore ensuring this information, wherever possible, is available and communicated to the community is critical regardless of which approach is used.

Kāinga Ora has expressed an initial interest in acquiring six of the identified sites through a direct sale and is undertaking initial due diligence as part of its acquisition processes. Those sites are:

- Lee Road Reserve
- Coulter Road Reserve (part only)
- High Street Reserve (part only)
- Glenholme Reserve - 117 Clinkard Avenue (part only)
- Turner Drive Reserve (part only)
- Steeles Lane Reserve (part only)

As stated above, Kāinga Ora has committed to building additional homes in Rotorua within the next three years if appropriate sites are available. There is merit in providing a wider selection of sites for Kāinga Ora to develop, enabling more distributed provision of public homes across the city. Kāinga

Ora is open to providing a mix of housing types within each site (e.g. Kiwi builds) but notes the dire emergency housing situation that exists in our community and the ongoing and unsustainable reliance on motels.

It is recommended that any decision to sell any of the identified reserves sites directly to Kāinga Ora is conditional on:

- Kāinga Ora and Council reaching agreement on the agreed value of the identified sites, and
- Kāinga Ora committing to providing mixed model housing developments that include a mix of social housing and progressive home ownership models and market sale, and
- Kāinga Ora committing to developing the sites within two years.

Council staff have been working collaboratively with the Fordlands Community Association to achieve housing and wellbeing outcomes within the wider Fordlands area, leading to the inclusion of Wrigley Road Reserve in this proposal. One of the outcomes the community association is trying to achieve is influencing the placement processes of community housing providers (CHP) to ensure whanau from Fordlands currently living in emergency housing are given the opportunity to return to Fordlands.

With respect to Wrigley Road Reserve, it is recommended that Council staff work directly with the community association to identify an appropriate CHP to acquire the land and enable the wider housing outcomes for the Fordlands community to be achieved.

All other sites would be disposed of through market sale and would also be conditional on the purchaser committing to developing the sites within two years.

The alternative option is that all identified sites, with the exception of Wrigley Road Reserve, be disposed of through market sale. With a large number of developers based in or interested in investing in Rotorua it is expected there would be significant interest in the sites. This option would also provide the opportunity for Kāinga Ora to purchase some of the sites but through a market process.

Next steps

The following actions are required to be undertaken before a local Bill could be progressed:

- Final engagement with mana whenua and key stakeholders on the sites proposed for inclusion in the local Bill;
- Development and finalisation of information and documentation to inform the community of the proposal and process for having a say;
- Analysis of feedback and final decision-making by Council;
- Drafting of the local Bill and consultation with the Parliamentary Counsel Office;
- Preparation and approval by Land Information New Zealand of Survey Office Plans for identified sites (required for any local Bill dealing with land);
- Final in-principle agreement reached with Kāinga Ora.

6. TE TINO AROMATAWAI ASSESSMENT OF SIGNIFICANCE

The decisions in this report are considered significant in accordance with Council's Significance and Engagement Policy. This states that the matter is likely to be significant where a proposal or decision is likely to generate a high level of community interest.

7. NGĀ KŌRERO O TE HAPORI ME TE WHAKATAIRANGA COMMUNITY INPUT/ENGAGEMENT AND PUBLICITY

Early consultation on the proposal with mana whenua has been undertaken and is ongoing.

In addition, Council staff have consulted with the Kōhanga Reo on Coulter Road Reserve and the Kindergarten on High Street Reserve, both of which have existing leases for these sites. It is not proposed to revoke the status of the land occupied by these groups. Consultation to date has been positive.

The development of a Statement of Proposal and resulting feedback process provides an initial public and neighbourhood process. Both a local bill process and the standard Reserves Act process would provide further opportunity for public submissions on the proposal.

8. HE WHAIWHAKAARO CONSIDERATIONS

8.1 Mahere Pūtea Financial/budget considerations

There are no financial considerations associated with the decisions in this report.

8.2 Kaupapa Here me ngā Hiraunga Whakariterite Policy and planning implications

The decisions associated with this report are consistent with the 2030 Goals of 'Thriving Communities' and 'Homes that match needs' and He Papakāinga, He Hāpori Taurikura – A Strategy for Homes and Thriving Communities

8.3 Tūraru Risks

There is a risk that the decisions associated with this report could result in a negative public perception. The breach of confidential discussions from an elected members forum has created a negative perception of the proposal and did not identify the reasons and considerations that have been traversed in this report and in the due diligence process being applied to any potential reserve.

This report notes that a preliminary report was provided to Council in October and unanimous 'in-principle' support provided to staff to begin due diligence processes. As noted in this report, this has resulted in some possible sites being removed.

8.4 Te Whaimana Authority

Council have authority to make decisions associated with this report.

9. NGĀ ĀPITIHANGA ATTACHMENTS

Attachment 1: Eastern Area - Reserves (or parts of reserves) identified for revocation and disposal - RDC-1256498

Attachment 2: Central Area - Reserves (or parts of reserves) identified for revocation and disposal - RDC-1256499

Attachment 3: Western Area - Reserves (or parts of reserves) identified for revocation and disposal- RDC-1256500

Attachment 4: Land status and acquisition history of identified reserves- RDC-1253599