

KINGS PARK AND BOTANIC GARDEN
KINGS PARK BUSHLAND

Analysis of Public Submissions to the
Draft Management Plan

1995

I R Dixon and K Keys



CONTENTS

INTRODUCTION.....	1
ANALYSIS OF PUBLIC SUBMISSIONS.....	1
Method of Analysis.....	1
Number and Origin of Submissions.....	2
ANALYSIS.....	2
OVERALL COMMENTS.....	3
PART A. INTRODUCTION. Summary.....	5
1.0 OVERVIEW.....	3
1.1 Bushland Overview.....	5
1.2 Historical Perspective.....	6
2.0 MANAGEMENT GOALS.....	6
2.1 Principal Management Goals for Kings Park Bushland.....	6
2.2 Values and Management Concerns.....	7
PART B. LAND USE MANAGEMENT.....	7
3.0 LAND TENURE.....	7
4.0 ZONING.....	9
PART C MANAGEMENT FOR CONSERVATION.....	10
5.0 PRINCIPAL CONSERVATION ISSUES.....	10
6.0 PHYSICAL RESOURCE MANAGEMENT.....	12
6.1 Climate.....	12
6.2 Geology, Landform, Soils and Erosion Risk.....	13
6.4 Visual Resource Management.....	14
7.0 BIOLOGICAL RESOURCE MANAGEMENT.....	16
7.1 Vegetation.....	16
7.2 Flora.....	20
7.3 Fauna.....	22
7.4 Disease and Pests.....	25
7.5 Fire.....	27
7.6 Feral Animals and Domestic Pets.....	34
7.7 Environmental Weeds.....	38
7.8 Bushland Restoration.....	40
8.0 CULTURAL RESOURCE MANAGEMENT.....	42
8.1 Aboriginal Heritage.....	43
8.2 Post Settlement History.....	43
9.0 RESOURCE MANAGEMENT.....	44
9.1 Extraction of Raw Materials.....	44
9.2 Utilities and Services.....	45
9.3 Beekeeping.....	46

PART D. MANAGEMENT FOR RECREATION.....	46
10.0 PRINCIPAL RECREATION DIRECTIONS.....	46
11.0 RECREATION OPPORTUNITIES.....	47
11.1 The Region.....	47
11.2 The Bushland.....	47
12.0 ACCESS.....	48
12.1 Car Parking.....	50
13.0 BUSHLAND RECREATION.....	50
14.0 RECREATION ACTIVITIES.....	52
14.1 Nature Appreciation.....	52
14.2 Bushwalking.....	52
14.3 Cycling.....	53
14.4 Pleasure Driving and Sightseeing.....	54
14.5 Wildflower Nodes.....	55
14.6 Barbecuing and Picnicking.....	55
15.0 SIGNS.....	56
PART E. INFORMATION, INTERPRETATION AND EDUCATION.....	56
16.0 INFORMATION, INTERPRETATION AND EDUCATION.....	57
PART F. RESEARCH AND MONITORING.....	60
17.0 GOALS FOR RESEARCH AND MONITORING.....	60
PART G. IMPLEMENTATION OF THE PLAN.....	61
18.0 STAFF AND FUNDING.....	61
19.0 LIAISON.....	62
20.0 EVALUATION AND REVIEW.....	62
21.0 PRIORITIES.....	62
APPENDIX 1. Submissions to the Draft Management Plan.....	64

INTRODUCTION

This document analyses submissions to the Bushland Draft Management Plan for Kings Park and Botanic Garden. Comments have been detailed to the section of the Draft Bushland Management Plan to which they refer.

The Bushland Draft Management Plan was released for public comment on 4 November 1993 by the Hon. Minister for the Environment Kevin Minson, MLA. However, submissions received shortly after this date were accepted. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the Bushland Draft Management Plan was available for comment. The Bushland Draft Management Plan was distributed to the Department of Conservation and Land Management, Universities, the State and local libraries and numerous individuals. Copies of the draft plan were available for perusal at the City of Subiaco and the library at Kings Park and Botanic Garden. The draft plan was also available for purchase at the Parks administration centre.

ANALYSIS OF PUBLIC SUBMISSIONS

Method of Analysis

The public submissions to the Bushland Draft Management Plan were reviewed in three stages:

Public submissions were summarised to allow analysis;

The submissions were assessed using the criteria below;

1. The draft management plan was amended if the submission:
 - a) provided additional resource information of direct relevance to management;
 - b) provided additional information on affected user groups of direct relevance to management;
 - c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
 - d) proposed strategies that would better achieve management goals and objectives; or
 - e) indicated omissions, inaccuracies or lack of clarity.
2. The draft management plan was *not* amended if the submission:
 - a) clearly supported the draft proposals;
 - b) offered a neutral statement, or no change was sought;
 - c) addressed issues beyond the scope of the plan;
 - d) made points which were already in the plan, or had been considered during plan preparation;
 - e) indicated strongly opposing views with the existing strategies providing a preferred management option; or
 - f) contributed options which were not feasible (generally due to conflict with existing legislation, Government or department policy).

Comments made in submissions have been assessed entirely on the strength of points raised. No subjective weighting has been given to any submissions for reasons of its origin or any other factors which would give cause to elevate the importance of any submission above another.

Number and Origin of Submissions

Most submissions were substantial. No petitions were received. The number and place of origin of submissions are listed below.

	Number	Percent
Community Organisations	7	17%
Government (State)	2	5%
Individuals	30	73%
Universities	2	5%

A list of individuals and organisations who submitted comments on the Kings Park and Botanic Garden Bushland Draft Management Plan is given in Appendix 1.

ANALYSIS

The Analysis tabulated below contains:

- The number of different comments made about each section of the Draft Plan;
- A summary of each comment made on the Draft Plan;
- The number of submissions received on each comment;
- An indication whether or not the comments resulted in an amendment to the Final Plan or an indication of what action was taken in the Final Plan;
- A discussion on why the comment did not result in an amendment to the Final Plan or an indication of what action was taken in the Final Plan; and
- The criteria by which each comment was assessed.

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
	OVERALL COMMENTS				
1	Generally support the plan.	12	No		2a
2	Strongly support the plan.	16	No		2a
3	Document addresses majority of conservation/biological issues for the area.	2	No		2a
4	Comprehensive document, attention to detail, well written and presented, as well as informative.	13	No		2a
5	Conservation is the main issue of the bushland.	2	No		2a
6	Draft plan has "negative" tone, especially with regard to recreation section.	1	Yes		1e
7	Concern about fate and implementation of the plan. Dedicate funding and implement as soon as possible.	6	No		2d
8	Integrated plan needed - should discuss why not done. Readers don't know priority Kings Park places on bushland in relation to other areas within the Park.	1	No	Comment acknowledged. Priority given to bushland - no Management Plans for other areas at present.	2c
9	Two month submission period not long enough.	3	No	Long period of comment before normal 2 month period.	2f
10	Lack of detail on flora and fauna, and the effects of fire, weeds and feral animals etc. Background document should have been made available at the same time or more appendices supplied.	1	No	See Pvi, Para 3, point 2.	2d
11	Should be used as a guide for other bushland managers in metro area.	5	No	See Pvii, Para 3.	2c

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
12	Draft plan carries more detail than expected for most areas of urban bushland and thoroughly addresses large number of issues, including implementation phase.	1	No		2a
14	Strongly concur with the value placed on the bushland and the careful management designed for it.	3	No		2a
15	Bold Park bushland should be managed by Kings Park and Botanic Garden.	1	No	Beyond scope of the plan.	2c
16	Recommendations do not specify who should carry out their implementation.	1	No	See P95-96. Plan is not a detailed Divisional operational plan. Allows flexibility for new processes.	2f
17	Recommendations not concrete or prescriptive enough. If method of implementation is not known then it should be stated so and an investigation recommended.	2	No	See above comment.	2f
18	Plan shows leaning to conservation issues, with recreation taking second place to conservation. This position is seen as noble but unrealistic.	1	No	The resource is paramount. Aim of plan is to retain ecological integrity.	2d
19	Changes made to Draft should be based on the best evidence submitted, not as stated Pvi, 2nd section point 4.	1	No	See Pvi, Para 1, point 1 & 2. Resources are limited and priorities must be made.	2d
20	Plan is a bland document based on CALM management plans so should create few problems.	1	No		2b

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
21	Nowhere does the plan state the assumptions on which it is based e.g. is it assumed to be a stable, climax or a dynamic state of constant episodic regeneration following disturbance i.e. an example of patch dynamics?	1	No	Issue will be addressed in resource document. More research is required for comprehensive understanding	2d
22	Legal aspects: References to Parks and Reserve Act or to the Kings Park By-laws, show a poor understanding of them. No mention made of the Occupiers Liability Act 1985 or the Occupational Health, Safety and Welfare Act 1984. Signs, as a means of warning people of their responsibilities, is a contentious issue.	1	Yes	Plan amended.	1a
23	Question the necessity of the use of heavy paper in a conservation document? Recycled paper should be used and pages should not be left blank.	1	Yes	Final plan will have lighter paper for each Part.	1b
24	PART A. INTRODUCTION Summary 1.0 OVERVIEW P3-9: Introduction explains the background of the plan very well.	1	No		2a
25	P3: Public still need opportunity for comment during the 10 year period of plan.	1	No	Public input always welcomed & considered. See Rec No 1, Section 20.0	2b
26	P3, Para 2: Summary wording is ambiguous with regard to public appreciation and its part in effective management.	1	Yes	Amended wording to read "also improved public appreciation".	1e
27	1.1 Bushland Overview P4, Para 2: Increase public involvement with Kings Park through interaction with local government authorities and government departments.	1	No	See Section 17.0	2d
28	P3-4: Supports Board's views/attitudes.	1	No		2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
29	P3, Para 2: Delete "series of studies", it makes no sense.	1	Yes	Reword to clarify.	1e
30	P3, Para 3: Ensure Kings Park bushland is listed for consideration to be included on the Register of the National Estate.	2	No	Acknowledged.	2d
31	P3, Para 3: Confusion between use of Commission and Council in relation to cultural heritage and its registration.	1	Yes	Amended wording.	1e
32	1.2 Historical Perspective P4: Fully supports.	1	No		2a
33	P4, Para 1: Inaccurate, reword to correct the meaning.	1	Yes	Plan amended.	1e
34	P4, Para 3: Significance of A Class Reserve should be explained as readers may be assume that it means nature conservation.	1	No	The significance of "A Class" refers to <i>security of tenure</i> (need an Act of Parliament to change). Use of land can be any public purpose designated at time of proclamation.	2d
35	P4, Para 6: Inaccurate interpretation of Act. Reword to correct.	1	No	Act is interpreted differently to that suggested.	2f
36	2.0 MANAGEMENT GOALS 2.1 Principal Management Goals for Kings Park Bushland P7, point 2: Add the factor of human impact.	1	Yes	Plan amended.	1e
37	P7: Concern as to how Principal Management Goals for Kings Park bushland relate to overall goals for Kings Park and Botanic Garden.	1	No	Beyond scope of plan.	2c
38	P7: Supports all goals as proposed.	3	No		2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
39	P7: Suggest clarification between values of bushland and Botanic Garden to avoid confusion.	1	No	See above comment.	2c
40	P7: Suggest Kings Park bushland's primary role is one of recreation, more so than conservation and should be reflected in the plan.	1	No	Primary concern is to maintain the bushland ecology.	2e
41	P7: Add extra goal to list of principal management goals for Kings Park bushland "Public Involvement - seek to involve the community in Kings Park bushland conservation."	1	Yes	Added goal.	1b
42	2.2 Values and Management Concerns P8: Supports all values and management concerns.	2	No		2a
43	P8: Suggest fire prevention be given stronger emphasis.	2	No	See amended Section 7.5.	2d
44	P9: Add the following to management issues: traffic, noise, litter and vandalism.	1	Yes	Amended plan.	1e
45	P9: Add a brief section: "2.3 Opportunities" - opportunities presented by Kings Park e.g. educational and demonstrable.	1	No	The plan was designed as a 'working document'. For information, see Section 16.0.	2d
46	PART B. LAND USE MANAGEMENT 3.0 LAND TENURE P13: An education program aimed at adjacent land owners and visitors to the bushland could help reduce the impact of introduction of weeds to the bushland.	2	No	See P16, Rec No 2.	2d
47	P13, Boundaries: "south-eastern" should read "north-eastern".	1	Yes	Amended plan.	1e

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48	P13, Para 1, Boundaries: Wording is confusing. Suggest: "As a result of the terrain the surveyed boundary of adjoining private land containing remnant vegetation and the position of protective fencing, do not coincide."	1	Yes	Suggestion included.	1e
49	P13, Para 2: Amend dates relating to when Board first gazetted, from 27/12/1901 to 24/1/1896, and as Kings Park Board on 27/12/1901	1	Yes	Amended plan to include dates.	1e
50	P13, Para 4: Road verges are vested in Perth City Council only, not Subiaco Council.	1	Yes	Amended plan.	1e
51	P13, Para 7, Surrounding Land: "south-eastern" should read "north eastern", and it is questionable that "All" surrounding land is mainly for residential use.	1	Yes	Amended plan.	1e
52	P13, Obj. 1: To support this, a recommendation of no further clearance of the bushland is needed.	1	Yes	Amended Recs.	1d
53	P13, Obj. 1: Supports the objective, bushland is too rare and valuable for further intrusions.	1	No		2a
54	P13, Obj. 1: Not allowing clearing or modification of the bushland is too restrictive.	1	No	See P3, 1.0 OVERVIEW.	2e
55	P13, Will Mounts Bay Gardens be protected as a picnic area under the management plan?	1	No	Yes, see Map 3, developed areas are along Mounts Bay Road.	2c
56	P15, Map 3: Exclude the Bush Arboretum strip, the War Memorial strip and the Botanic Garden strip of bush from the Management Plan.	1	No	See Section 7.1, point 1.	2e

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57	P16, Rec No 2: Not clear where there are adjacent land owners managing areas of bushland.	1	Yes	See Section 3.0, Boundaries, Para 1	1e
58	P16-17, Obj. & Recs 1 & 2: Support both objectives and recommendations.	2	No		2a
59	4.0 ZONING P.16 Conservation Zone: Appears that Special Conservation Zone, Low-Impact and Medium-Impact Zones are sub-sets of conservation zone; need to amend text to reflect this in both Table 2 and Map 4.	1	Yes	Suggestion incorporated.	1e
60	P16, Para 3: The use of the word "frequent" is not quantitative and therefore has little meaning e.g. frequent to some is less than 4 years, to others it may be less than 25 years. Suggest "damaging wildfires". Strongly dislike the use of this word used in this context.	1	No	Use of a blanket quantitative measure is unacceptable to cover multitude of species with vastly differing requirements.	2e
61	P16: Accepts the objectives.	1	No		2a
62	P16-17, Obj. & Recs: Support the objective and recommendations.	3	No		2a
63	P16-19: Inconsistency between the text and Map 4. Map and text need to be amended.	8	Yes	Amended text and Map 4.	1e
64	P17, Para 3: Should read "Name allocation should not commence until it has been determined which pathways are to remain open and which are to be closed for revegetation purposes".	1	Yes	Amended plan.	1e
65	P17, Medium Impact Zone: Support areas for hands on activities - vitally important.	1	No		2a

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66	P17: There should be another management zone for the bushland - High Impact Zone, to include roads, carparks etc.	1	No	Already shown as developed areas.	2d
67	P17, Recs: Strongly support Recs 1-3.	2	No		2a
68	P18, Map 4: Does not show May Drive Circle as different to bushland, should be left white as developed.	1	Yes	Amended Map.	1e
69	P18, Map 4: Should show at least one Special Conservation Zone such as the <i>Banksia ilicifolia</i> area, more than two low-impact zones, and several proposed medium -impact zones (excluding the 2 shown).	1	Yes	See P16, Para 4. Special Management Zones added to Map 4.	1e
70	P18, Map 4: Where "Special Conservation Zone" is specified in the Map Legend it should read "Conservation Zone". Special Conservation Zones have not been shown and it is important these areas are identified to the public. If they are changeable then a mechanism for communicating the changes to the users of the Park should be created.	1	Yes	See above comment. Comments acknowledged.	1e
71	P 19, Table 2: The wording "Recreation not encouraged" is really negative. Positive wording e.g. "walking and cycling on designated paths only is encouraged".	1	Yes	Suggestion incorporated. "Recreation only encouraged on designated pathways."	1e
72	P19, Table 2: "Recreation Opportunities" should read "Recreation and Education opportunities". Table is difficult to understand.	1	Yes	Amended plan in part.	1e
73	PART C. MANAGEMENT FOR CONSERVATION 5.0 PRINCIPAL CONSERVATION ISSUES P23: Support the Conservation Goals as outlined.	2	No		2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
74	P23 : Add another goal to Conservation Goals: "Reconstruct the original flora and fauna."	1	No	Records do not show full census of species or communities.	2e
75	P 23, point 4: Particularly pleased to see and fully supports the goal "Minimise the occurrence, size and undesirable effects of fire".	1	No		2a
76	P23, Point 4: Change "Minimise undesirable effects of fire" to be more specific, especially to state that the real problem is frequent fires, and not fires <i>per se</i> .	1	No	Point 4 also includes "occurrence and size" to cover issues of frequency and area of spread.	2d
77	P23, point 5: "Control weeds and feral animals" may not satisfy the first goal (point 1)	1	No	Elimination is unlikely to be achieved.	2d
78	P23, Para 2: Amend text to read "Conservation values will be protected by minimising degradation caused by fire, disease, weeds, feral animals and park visitors. "	1	Yes	Suggestion included.	2e
79	P23, Para 2: Agree with Conservation Strategy.	3	No		2a
80	P23, Para 2: Amend Conservation Strategy; noble to encourage activities compatible with conservation goals but more realistic to recognise the discouragement of activities not compatible with conservation goals is more likely.	1	No	Positive language is more desirable than negative language.	2d

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81	6.0 PHYSICAL RESOURCE MANAGEMENT 6.1 Climate P 23: This section is unnecessary and should be deleted. Information in this section could be incorporated into the Overview Section. Recommendation 6.1 1&2 should be deleted.	1	No	Wanted formal recognition of weather change and its implications for management	2e
82	P23, Para 3: Amend text "While it is difficult to 'manage' the effects of climatic change and the <i>direction of future changes is uncertain</i> , monitoring will play an important role."	1	Yes	Reworded to clarify.	1e
83	P23, Recs: Support the recommendations for Climate	2	No		2a
84	P23, Obj. & Recs: Support the objectives and recommendations for Climate.	1	No		2a
85	P23, Rec No 1: Substitute the word "weather" for "climate", and the word "danger" for "risk".	1	Yes	Amended Rec No 2.	1e
86	P24, Para 2: "Slope and relief of the land" affect both the frequency and intensity of fires. I would expect slope and relief to affect fire intensity much more than frequency.	1	No	"Frequency" is the main issue in determining land use in the bushland. Intensity is less compelling.	2d
87	P25, Para 1: The word "occurred" should replace the word "discovered".	2	No	Date of incident unknown.	2d

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87	6.2 Geology, Landform, Soils and Erosion Risk P24, 25, Obj. & Recs: Support the objectives and recommendations	3	No		2a
88	6.3 Hydrology P25,26-27 Obj. & Recs: Strongly agree with the objectives and recommendations and support them being given a high level of priority.	1	No		2a
89	P26, Para 5: "There are 8 bores in Kings Park and Botanic Garden." Add "operated by the Board and 3 others, one operated by the Royal Kings Park Tennis Club in its grounds, and 2 operated by Perth City Council on Kings Park Road and on Thomas Street".	1	Yes	Amended text.	1a
90	P26, Recs: Support the Hydrology recommendations.	3	No		2a
91	P26, The effect of a lowered water table will be devastating and irreversible so areas under irrigation should be limited and economically administered.	1	No	See Rec No 1, this Section	2d
92	P26, Rec No 1: Some perspective is needed in evaluating the degree of water pollution in Kings Park.	1	No	Comments acknowledged.	2b
93	P27, Rec No 5: Sighting of bores will largely be determined by the presence of water, whether in aquifers or postulated perched water tables. Steady draw-downs are desired to reduce iron and bacteria problems etc; refer to Hydro-Plan Pty Ltd report (1989-1990).	1	No	Comments acknowledged.	2d

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94	6.4 Visual Resource Management P27, Obj.: Strongly support the VRM objective and would like to see the removal of non-local avenue trees and other non-local trees and shrubs.	1	No	Comments acknowledged	2a
95	P27: The Honour and Centenary Avenues along the Kings Park and Botanic Garden carriageways are of significant cultural heritage value and should be maintained as they presently are. Not all visitors find them visually unacceptable.	2	No	Heritage value is great (see Rec No 1, Sect 8.2) but trees will need replacement. See Rec 13, Section 7.7	2e
96	P27: Ensure that vegetation surrounding 'scenic' locations is kept in check. It's no good having a view if you cannot see through the lush growth.	1	No	Views already available in number of locations e.g. Botanic Gardens, Fraser Ave, State War Memorial.	2e
97	P27: All efforts should be made to eradicate plants such as Veld Grass, Wild Gladioli and tree weeds as they impinge on the natural landscape.	1	No	See P27, Para 5.	2a
98	P27, Para 5: Visual impact should be in keeping with the area, therefore avenue trees should be of the area; bushland lost for the sake of vistas should be restored and all weeds including tree weeds be removed.	2	No	See P57, Rec No 13. Changes to Vista are beyond scope of plan.	2a
99	P27-32: Pleased to see a section of VRM. Landscape of Perth is visually confused, important to have places with visual harmony. People should be able to appreciate the bushland's character. It is important the bushland be retained free of visual distractions such as non local trees and shrubs.	1	No		2a

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100	P27-32: Although VRM is an important subject, this section and the associated recommendations could usefully benefit from a severe pruning.	1	No	Planning and VRM of neighbouring areas often does not consider the bushland. Issues made clear for future management.	2d
101	P27, P32 Obj. & Recs: Agree with draft objectives and recommendations.	1	No	Comment acknowledged.	2a
102	P28: Note the gazetted height restrictions along Mounts Bay Road. They should be retained and extended to Old Swan Brewery site if this has not already been done.	1	No	Information noted.	2c
103	P29, Table 3: Note earlier discussion of Avenues in Kings Park i.e. Centenary and Honour Avenues should be maintained as they are.	1	No	Comments acknowledged. See Section 7.7.	2e
104	P30: The term "Developed Areas" relates to areas changed from natural bush to human altered environments. A more appropriate name for these areas could be "Deliberately Altered Areas". The current use of the English language is often a hindrance to communicating conservation values.	1	No	Use of the term developed areas is commonly understood	2d
105	P31: Note that tree line in views of the Kings Park escarpment from the City of Perth and from South Perth is composed virtually entirely of Fraser Avenue Lemon Scented Gums and the Pines about the reservoir. Bushland contributes to tree line as viewed from Como, Applecross and Matilda Bay and Pelican Point (Crawley). Views of the reverse slope of bushland possible from Hollywood (Nedlands).	1	No	Bushland trees can be seen from areas stated in plan.	2d
106	P31: Under the heading "View Enhancement", the phrase, "without developing the bushland or its natural flora and fauna", is a misuse-of the word "develop".	1	No	Oxford dictionary definition	2d

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107	P31, Para 4, point 1: The view from the DNA tower is the primary view in the Park but the reverse view up to it from the lake is also important.	1	No	The tower offers views of bushland but tower itself, the vista and Arthur Fairall Playground, are not part of the bushland.	2c
108	P31, Para 6: "Flame Triangle" should read "Poole Triangle".	1	Yes	Amended plan.	1e
109	P31, Para 6: Delete "Lovekin Drive" and insert "May Drive".	1	Yes	Amended plan.	1e
110	P31, Para 6: Add the AMP Building to those buildings that received a dishonourable mention in the draft, as it can be seen from clearly at night from May Drive Circus.	1	No	Sufficient examples given	2d
111	P32, Point 6: Screening of buildings, including toilets, may give rise to security problems, harassment of visitors and so on.	1	No	Comments acknowledged.	2d
112	P32, Rec No 3: There are far too many traffic signs in the Park and they should be regarded as visual pollution.	1	No	See Section 15.0 Signs. Traffic signs governed by Regulations and Australian Standards	2c
113	P32, Recs: Support the recommendations provided they do not interfere with the overall conservation objective to preserve the bushland.	1	No		2a
114	7.0 BIOLOGICAL RESOURCE MANAGEMENT The overall policy is highly commendable.	1	No		2a
115	7.1 Vegetation P 33, Objective: In the absence of a clear statement of an assumption about the mechanisms of regeneration e.g. patch dynamics, visitors and those familiar with the Park will interpret the objective for 7.1 as true protection in the dictionary meaning: <i>protect to preserve from injury or change and keep safe.</i>	1	Yes	Reworded to clarify, "is to ensure the long term survival of the plant communities indigenous to Kings Park bushland."	1e

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116	P33, Objective: People do not come from foreign parts to see flowers they left behind. They come to see our flora. It will be a better tourist attraction if it is truly more representative of Western Australia.	1	No	See Sections 7.1, 7.2 and 7.7.	2a
117	P33, The objective "protect existing native plant communities" should be made more specific to exclude West Australian and Australian plants not local or indigenous. Important to maintain plant community integrity to show visitors a 'true' representation of specific communities and not bushland of Sugar Gums, Brachychitons and Peppermints. Showing such is a serious abrogation of responsibility and effectively tell a lie. More natural appearance is more attractive and likely to be more treasured.	1	Yes	Reworded to include "indigenous" to clarify text.	1e
118	P33, Confusion in the use of the words "type" and "community". This section (Plant Communities) needs to be clarified with a clear indication of the number of communities recognised	1	Yes	Amended plan for clarification.	1e
119	P33, Plant Communities, Para 4: <i>Banksia ilicifolia</i> should be re-introduced from the closest available seed stock. Suggest liaison with Queen Elizabeth Medical Centre and establish a rehabilitation program for their wetland and to include <i>B. ilicifolia</i> .	2	No	Suggestion acknowledged. See Section 7.8 Recommendations.	2a
120	P33, Obj. and Recs: Support the objective and recommendations 1 -7.	3	No		2a
121	P34, The legend on P34 does not explain the codes on the vegetation map.	1	Yes	Map amended, "Refer to Table 4".	1e

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122	P34: Map 6 is not visually clear. Text is hard to read against dark background.	1	Yes	Map amended.	1e
123	P35, Monitoring Plots: Any research from the results (fire) of monitoring should be made public.	2	No	Research results are always publicly available.	2d
124	P35, Para 2: Amend to read "Disturbance in the bushland since European settlement such as logging, <i>without regeneration</i> , fires and the introduction of pasture grass has effectively reduced the density of Eucalypts. "	1	No	Logging, even with regeneration, is still a disturbance.	2d
125	P35, Para 2: Beard quoted as mapping the Park within the Banksia woodlands of south-western Australia as "Banksia woodland with scattered eucalypts". Beard is not listed in the references, neither is Heddlé et al. (1989) cited immediately above. The latter should read (1980). If Beard (1979) is meant, the reference has been misread. Beard's 1:250 000 vegetation map of the Perth area, 1979, shows Kings Park as under Eucalypt Woodland of <i>E. marginata</i> and <i>E. gomphocephala</i> in the Spearwood Vegetation System.	1	Yes	Bibliography and references corrected.	1e
126	P35, Para 3: Amend to read "Hopper and Burbidge (1989) found that only 7% of the Banksia woodlands in south west Western Australia they investigated were in conservation reserves."	1	Yes	Amended plan.	1e

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127	P 35, Para 3: Conserve the bushland in Kings Park by all means but to consider that by doing so the area representative of particular types of vegetation or biological communities will thereby be increased is misleading and weakens the case to secure more truly representative examples elsewhere. The disturbances, losses and additions to the flora and fauna of Kings Park have rendered it atypical of natural bushland. The study of the perturbations and the search for remedies to them are worthy objectives in themselves, but it is erroneous to accept such examples as representative of the baseline condition.	1	No	Plan does not state that vegetation communities will increase.	2d
128	P.35: Under "Conservation Status of the Plant Communities" the threat of disease is mentioned but not weeds. Recommend a brief paragraph on the affect of weeds on plant communities be added and an appropriate recommendation made.	1	No	See Sections 7.2 Flora and 7.7 Environmental Weeds.	2d
129	P36, Rec No 1 (Also sections referred to): While it is expedient to show that every possible measure has been taken, it is dubious if much more will be achieved than by those of them already practised.	1	No	Comment acknowledged.	2d
130	P 36, Rec No 4: Should be developed into a major theme. Like to see a very firm goal and program on regeneration and reconstruction of native vegetation. It would be a great opportunity to demonstrate techniques to Western Australians.	1	No	See Section 7.8 Bushland Restoration and Section 16.0.	2d
131	P36, Rec No 7: In addition to defining boundaries between bushland and developed areas on the escarpment (Rec. 7), clear boundaries need to be defined for all areas of bushland.	1	Yes	P34, Map 6: add under the map title "developed areas are omitted".	1e

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132	P37: The communities listed on Table 4 should be listed in the same order as appears in Map 6, the first letter in community code should be highlighted as in the map legend.	1	Yes	Table 4 amended.	1e
133	7.2 Flora P38, Para 3: Add to the last sentence "and lead to modified behaviour to protect and conserve it".	1	Yes	Plan amended in part	1e
134	P38: Clarify by substituting "As well as some duplicates, all unicats and types in Kings Park collections have been transferred to and are kept in the Western Australian Herbarium (Perth)".	1	Yes	Amended plan.	1e
135	P38: Some cross-reference to the weeds section should be made.	1	Yes	Amended plan, "Refer to Section 7.7 Environmental Weeds".	1e
136	P38: In the section on Flora I think it would be useful to distinguish clearly between the following categories of plants:- local plants, weeds and ornamentals.	1	No	Suggested wording is not specific enough. See Section 7.7.	2d
137	P38, Obj. No 1: "Protect and maintain viable communities" Didn't Section 7.1 Vegetation, address conservation of plant communities? Shouldn't this section only address species conservation?	1	Yes	"communities" omitted.	1e
138	P38, Obj. No 4: "Planted" should read "Plant" otherwise introduced species which proliferate from seed in Kings Park bushland will be accepted as indigenous. This clearly contradicts the definition of weeds (P54). Recommendation 7, "Gradually replace introduced plants species" Plants" should read "plant".	1	Yes	Amended plan.	1e

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139	P38, Obj. and Recs: Agree with the objectives and recommendations and strongly support them being given a high level of priority.	2	No		2a
140	P38, Obj. and Recs: Agree with objectives and recommendations.	1	No		2a
141	P39: It is worth referring to Kingsley Dixon's comment that fertiliser kills mycorrhiza.	1	No	See Rec No 6, P61.	2d
142	P39, Para 2: Last sentence to read "native flora, fungi are protected".	1	Yes	Amended plan.	1e
143	P39, Recs: The recommendations to protect the native flora are excellent.	1	No		2a
144	P39, Rec No 4: Consider the Occupiers Liability Act in relation to dead trees etc. Dead trees can be a danger to the public.	1	No	Comment acknowledged. See Section 7.5 Rec No 21	2d
145	P39, Rec No 5: Limiting access to the escarpment should be emphasised.	1	No	See P38, Para 4.	2d
146	P39, Rec No 6: The development and maintenance of the herbarium of bushland flora should be retained as a high priority. It is assumed that this activity is closely linked to the information database referred to in Chapter 17, page 91.	1	No		2a
147	P39, Rec No 7: Cannot use the term "same provenance" as it would mean the same site. Suggest delete "of the same provenance" and substitute "similar habitat", or, substitute "similar" for "same".	1	Yes	Suggestion incorporated. Deleted "same provenance", inserted "same or similar genotype"	1e

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148	P39, Rec No 7: Substitute "Gradually" with "Systematically", it may imply more immediacy.	1	Yes	Amended plan.	1e
149	P39, Rec No 7: Contend that seed from the <i>Banksia ilicifolia</i> can be collected as they were collected in 1993.	1	No	Only two plants surviving in the bushland.	2d
150	P39, Rec No 7: Support recommendation 7. Plants (e.g. <i>E. cladocalyx</i>) should be removed without delay and replaced by flora of appropriate ethnicity. Plants that are "Australian" or "look nice" is insufficient reason for its retention. Any vegetation that is not native to WA is <i>prima facie</i> inferior.	1	No	Comments acknowledged.	2a
151	P56, Rec No 5: Supports the urgent removal of Freesia and Watsonia.	1	No		2a
152	7.3 Fauna P40, Obj. and Recs: Agree with the objectives and the recommendations.	4	No		2a
153	P42-3: Particularly pleased to see that logs and dead trees will be left to provide vital animal habitats.	2	No		2a
154	P 43, Recs: Propose addition to recommendations: Establish a Care of Native Fauna Committee and create a policy for the handling of sick or injured fauna found in the Park.	1	Yes	Added Recommendation No 9, P43.	1e
155	P40: Kings Park should not seek to become a botanical zoo.	1	No	See P43, Rec No 7. Zoo concept is beyond the scope of the plan.	2c

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
156	P40: Removal or reduction of feral animals may not be sufficient to allow reintroduction of some native species. If the specific habitat requirements of those species are not met then reintroduction will fail.	1	No	See P40, Para 5, last sentence.	2d
157	P40, 43, Obj. and Recs: All aspects of fauna protection are highly commendable.	1	No		2a
158	P40: Reintroduction should be considered for the Southern Brown Bandicoot and the Echidna, provided that a translocation plan is written up and adequate preparatory habitat survey and subsequent population monitoring takes place.	1	No	Suggestion acknowledged. See Rec No 7, P43.	2d
159	P40: Some cross reference to the feral animal section needs to be made.	1	No	See P40, Para 4.	2d
160	P40: Suggest a recommendation be included in this section for the investigation of feral animal control methods for Kings Park and Botanic Garden, including fencing. Both CALM and UWA have employed fencing around reserves and may be able to provide advice. Adequate on-going control of feral animals such as cats and foxes in urban setting is likely to be difficult and ineffective without fencing off Kings Park and Botanic Gardens.	1	No	See Rec No 1, P54. Fencing considered not appropriate and impractical for heavily used urban park.	2d
161	P40, Para 5: "Without the presence of feral predators" should read "If feral predators can be eliminated"	1	Yes	Amended plan accordingly.	1e
162	P40, Para 6: Wallabies etc dumped in Kings Park within last 20 years have been killed on the roads within or surrounding the Park. It may not be practical to reintroduce some animals for this reason.	1	No	Larger animals not intended for reintroduction.	2d

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163	P40, Para 7: Suggest provide 'possum houses' and appropriate food in garden areas to dissuade possums from grazing exotic plants and annoying nearby residents.	2	No	Not appropriate in bushland environment.	2e
164	P41: No reference to the protection of poisonous snakes.	1	No	See P40, Obj. 1.	2d
165	P41, Para 3: Makes no sense. Reword to clarify.	1	Yes	Reworded to clarify.	1e
166	P41, Para 4: Some people may not realise that a quenda is a bandicoot.	1	Yes	Plan amended.	1e
167	P42: Pleased that Plan recognises the relationship between inappropriate fire regimes, and the susceptibility to disease and imbalances occurring in insect populations.	1	No		2a
168	P42: Pleased to see the Plan acknowledges that insect populations and the impact of jarrah leaf miner can be detrimentally effected by logging operations and inappropriate fire regimes.	1	No		2a
169	P42, Para 4: The relevance of jarrah leaf miner to Kings Park is not obvious from the text. Either state the relevance or delete.	1	Yes	Added information to clarify.	1e
170	P42, Para 4: Believe information regarding jarrah leaf-miner outbreaks should be checked with I. Abbott. Need to qualify what "extensive burning" means.	1	Yes	Amended plan.	1e
171	P43, Recs: Add to the recommendations the leaving in place wherever possible, fallen logs and branches.	1	No	See P43, Rec 2. See Para 3, Frogs and Reptiles.	2d

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172	P43, Rec No 7: Feral animal control is not the only factor for consideration in reintroduction programmes. If bird species are to be reintroduced the major factors to be addressed include fire management and weed control, judging from Recher and Serventy (1991).	1	Yes	Amended Rec No 7. See P40, Para 5, last sentence.	1e
173	P43, Rec No 7: Thought should be given to attempt to reintroduce native birds previously recorded in the Park (Recher and Serventy, 1991). It is unlikely that feral animals had much to do with many of these bird species disappearing from the Park, rather, changes to habitat were the main cause.	1	No	See P40, Para 5. Birds are "fauna".	2d
174	P43, Rec No 8: Incorporate determination of true impact of feral predators on native flora and fauna through autopsies. Information gained from such can determine the effectiveness of such programmes. Expertise is available from the Agricultural Protection Board and CALM.	1	No	Information acknowledged and appreciated.	2d
175	P43, Rec No 7: Concern about whether this recommendation should be implemented, considering there is no policy mentioned to help injured native animals.	1	Yes	Rec No 9 added to plan.	1e
176	P40, 43, Obj. and Recs: Strongly support the objectives and recommendations and their high level of priority.	1	No		2a
177	7.4 Disease and Pests P46, Para 1: Question the validity of the statement regarding increase in jarrah leaf-miner, refer to work by I. Abbott.	1	No	Only suggestions as to pest increase, "may have". See Fauna 7.3, Invertebrates.	2d
178	P43, 46-47, Obj. and Recs: Support the objectives and recommendations.	2	No		2a

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179	P47, Recs: Add a recommendation to encourage the study and use of natural predation of pests.	1	No	Suggestion covered by Rec No 8, P47. Integrated pest management would be one of many considerations	2d
180	P45: This section on pests only refers to invertebrate pests not vertebrate pests such as foxes or feral cats. They should be addressed here, or cross referenced to section 7.3 Fauna and/or section 7.6 Feral Animals.	1	Yes	Suggestion incorporated.	1e
181	P46, Recs: Fully support the recommendations.	2	No		2a
182	P45, Para 4: Plants are affected, not effected, by disease.	1	Yes	Amended plan.	1e
183	P44: Dieback is a real concern for Kings Park and Botanic Garden, as it is in other bushland areas around Perth.	1	No		2a
184	P 44: The impact of particular species of <i>Phytophthora</i> in the Botanic Gardens is important in regard to potential impact on bushland. Dept. of CALM has more information on the impact of <i>P. megasperma</i> , <i>P. citricola</i> as well as <i>P. cinnamomi</i> .	1	No	Information acknowledged and appreciated.	2a
185	P44, Para 8: "Phosphorus " should be spelled "phosphorous".	1	Yes	Amended plan.	1e
186	P45: Since summer irrigation seems to have produced the conditions for <i>Armilaria</i> to become a serious disease in the Botanic Garden and some localities such as Hamersley Golf Course, sprinkler irrigation in the bushland should be viewed with caution....Stumps of unwanted trees should be poisoned or dug out to prevent spore infection.	1	Yes	Sprinkler system for fire control is not an irrigation system. Rec No 4 amended to cover control aspects.	1e
187	P46, Para 1: CALM foresters recommend opening up large gaps in the canopy for Tuart regeneration.	1	No	See 7.8 Bushland Restoration. Tuart regeneration is occurring, insect damage is the issue.	2b

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188	7.5 Fire P47, 51-53, Obj. and Recs: Completely supports the objectives and recommendations.	3	No		2a
189	P49, Para 5: Strongly support the concept of no prescribed burning during the life of the Plan. Enough accidental and criminal fires already occur.	3	No		2a
190	P49, Para 5: "No Prescribe Burn" regime is a novel approach, of course arsonists seem to have made prescribed burning unnecessary.	1	Yes	See Fig. 1 - 3. fire Section updated for clarification	1e
191	P49, Para 5: Good that the Plan does not advocate prescribed burning.	1	No		2a
192	P47, Obj. No 1: Fire exclusion policy has been criticised by CALM foresters, however that criticism does not take into account the self perpetuating fire/veld grass syndrome. When veld grass is eliminated forestry style burning regimes may be more appropriate.	1	No		2d
193	P47, Para 4: Insert "for fuel reduction" after "regular prescribed burning" in second sentence.	1	Yes	Reworded to clarify	1e
194	P47, Para 4: "burning about a quarter of the Park each year" Hardly a good thing ecologically, did it control fires?	1	Yes	Reworded plan to clarify	1e
195	P47: Obj. No 6, Delete "by" and substitute "through".	1	Yes	Amended plan.	1e
196	P47, Para 4: Delete "Parliament" substitute "Council". Presumably an Act of Council because there was no Parliament until 1890.	1	No	Direct reference from Green, 1984	2d

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197	P48, Para 4: Insert "incident" so reads "as one fire incident".	1	Yes	Amended plan.	1e
198	P48, Para 7: Spring burns also lead to loss/reduction of feeding cover and food, especially insects, to feed nestlings as well as the loss of birds themselves, and shelter.	1	No		2a
199	P49, Para 1: Add to the references, D. Monk on <i>Acacia pulchella</i> in Kings Park and K. Dixon on <i>Drosera erythrorhiza</i> .	1	No	Sufficient examples given on deleterious effects of fire.	2d
200	P49, Para 1: What is the current policy - no burning? What is the recent history of fire? You can't ignore the 1989 fire that easily.	1	Yes	Current policy is an integrated program incorporating no burning. No wildfires are ignored. Section updated for clarification	1e
201	P48, Para 3: Amend "south-eastern" to "south-easterly" and "north-eastern" to "north-easterly".	1	Yes	Amended plan.	1e
202	P48, Para 6: What kind of new fauna species - invertebrates?	1	Yes	Invertebrates and vertebrates.	1e
203	P48, Para 6: What will happen to pioneer species?	1	No	Seed remain in soil for next disturbance. See Para 4, P48.	2d
204	P48, Para 7: The Springett quote is rough as only some invertebrates were studied and research didn't follow through to post fire succession.	1	No	Illustrated the effect of fire on species habitat and diversity. Must consider fire frequency as well.	2d
205	P48, Para 7: "Bandicoots also require long-unburnt ground habitat" What reference?	1	Yes	Amended to include (J. Dell, pers, com. 30 March, 1993).	1e

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206	P48, Para 7: "visual quality can also result from fire". What sort of fire?	1	No	See John Forrest National Park Draft Management Plan, 1992, P41	1e
207	P49, Para 1: Frequency is only one facet of the fire regime. You should also mention season and intensity. Some species are favoured by "frequent" fire. It is frequent, <i>intense</i> fires that are disastrous.	1	Yes	Amended plan. Reworded plan to clarify	2d
208	P49, Para 3: Had the impression that the WA Fire Brigade were first on the scene to fires in the Park.	1	No	KP Crew the first. Brigade assists or stands by in some cases.	2b
209	P49, Para 3: Delete "appointed" substitute "authorise" or "confirm" or "endorsed" as a more realistic description of the situation.	1	Yes	Amended plan.	1e
210	P47, Obj. No 1: Note observations, P47, line 8; Fire exclusion policy has been criticised by CALM foresters. However, that criticism does not take into account the self perpetuating fire/veld grass syndrome. Frequent fuel reduction burns lead to sheet veld grass, causing rapid fire spread and giving off strong heat radiation, damaging to plant, animal and human life. When veld grass is eliminated forestry style burning regimes may be more appropriate.	1	No	Comments acknowledged.	2d
211	P49, Para 4: What is the detection system and how does it operate at night?	1	No	Staff vigilance, public response and WA Fire Brigade. communication always being updated.	2d
212	P49, Para 5: Should read "term of this Management Plan, prescribed burning for fuel reduction purposes shall not be used". This is a very dangerous decision.	1	Yes	Reworded to clarify.	1e

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213	P49, Para 6: Find the whole paragraph puzzling. Are you saying that wildfires cover the whole range of possible regimes	1	No	Incendary fires include small 'cool' fires as well as large intense fires.	2d
214	P49, Para 7: Sprinkler systems are not "new technology".	1	Yes	Plan amended	1e
215	P50, Map 7: Amend the map. Central portion bounded by May Dve and Forrest Dve should be indicated as areas where very heavy fuels will be allowed to accumulate, until a wildfire occurs, every few years.	1	No	Fuel levels may build-up elsewhere depending on how often wildfires occur.	2d
216	P51, Para 1: What about the build up of Banksia, Sheoak and Jarrah leaves, twigs and bark? Quote references.	1	Yes	Kings Park Annual Reports 1988/89, 1989/1990. Amend last sentence to include rate of spread as well as intensity.	1e
217	P51, Para 2: Sprinkler system will not help the bush at all.	1	No	Comment acknowledged.	2d
218	P51, Para 4: "aerial fire control", by what, water bombs? Would WAWA be happy? This is an absurd suggestion. The US National Parks Service spent \$200 million on this method alone and found it had zero effect on fire shape and size.	1	No	The suggestion was put forward for investigation.	2d
219	P51, Para 5: Why bother maintaining firebreaks when fallen debris etc will burn down in your next big fire.	1	No	Staff and visitor safety is taken seriously.	2d
220	P51, Para 7: Fail to see how Map 7 attempts to achieve protection from regular bush fires.	1	Yes	Re title the Map: "Strategic Fire Management Priority Areas."	1e
221	P51, Rec No 1: This has failed utterly in the past.	1	No	Has been highly successful.	2d
222	P51, Rec No 2: Can't comply with the recommendation as Map 7 is not a strategy for fire management.	1	Yes	Map 7 changed.	1e

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223	P51, Para 2: Reservations about the value of the sprinkler proposal. On occasion, fire has jumped over the broadwalk vista and also in the Botanic Garden whilst the sprinklers have been operating! Needs to be evaluated. Reference to Hydro Plan may be relevant.	1	No	Comments acknowledged.	2d
224	P51, Para 5: Note discussion of Occupiers Liability Act.	1	No	Comments acknowledged.	2d
225	P52, Rec No 6: If the areas burned are to be kept small and fires are to be attacked as far as possible from paths and fire breaks, this needs to be considered in relation to closure of "superfluous paths". See page 73, line 14.	1	No	Comments acknowledged.	
226	P52, Rec No 6: This will work for most years, but every 20 years or so, the whole lot will be lost.	1	No	Comment acknowledged.	2d
227	P52, Rec No 8: "black-out level" but how far in from the edge?	1	No	No prescription given - fire to be extinguished.	2d
228	P52, Rec No 11: See page 51, line 5. (Fire can jump over sprinklers and the sprinkler proposal should be tested).	1	No	Suggestion acknowledged. System to be used as a "wet" fire-break.	2d
229	P53, Rec No 21: The proposal to use herbicides to clear weeds from firebreaks is worthy but there could be some objections from those who consider that such practices will result in health risks to humans or native fauna or that pollution of ground water will result, even if that is unlikely.	1	No	Health Department is consulted before broadacre chemical use.	2d

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230	P48: Concerned that too frequent fires encourage weed growth and more fires and inhibit indigenous plant regrowth, with some local extinctions possible. Some plants need several years free of fire before they mature.	1	No	See Para 7, P48.	2a
231	P52, Rec No 11: I think very tall sprinklers e.g. 6m plus, to reach just above the tree canopy, placed in lines through the bush areas, where necessary to help stop fires (where vehicle usage must be avoided), may be a helpful idea.	1	No	Sprinklers will not be in the bush but along margins as a "wet" fire-break. See Map 7, P50.	2d
232	P50, Map 7: Map 7 is not consistent with the bushland boundaries with the bushland boundaries in Map 3 and Map 4. Recommend moving the Botanic Garden strip from the bushland. If it is to be watered as Priority 2 let it be as part of the Garden's management.	1	Yes	Add to text, Para 7 "See Map 3, P15 for bushland boundaries." Bushland adjacent to Botanic Garden is of high conservation value e.g. Priority Listed species. Sprinkler system is not irrigation system.	1e
233	P49: Suggest you give greater thought to fire protection. Subiaco could still be showered with embers and cause a disaster, even with sprinkler systems in place. Regular 5 year burns of sections is needed. Your panel doesn't include a senior fire brigade person.	1	No	Comments acknowledged. See Acknowledgments, Part A Pviii.	2d
234	P48: The list of fauna indicates there are no Bandicoots, yet justification for not burning is made, based on the destruction of their habitat by regular burnings (of short time intervals).	1	No	Plan states there <i>may</i> be bandicoots.	2d
235	P47, Obj.: Congratulate the Plan for its objectives of reducing the incidence, impact and area of unplanned fires and to avoid the use of prescribed burns.	2	No		2a

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236	P48, last Para : Clarify the reference to "John Forrest NP, 1992".	3	Yes	Amended plan.	1e
237	P53, Rec No 21: States that the ground will be kept clear of fallen debris etc. Should read "the ground of the fire breaks should be kept clear".	1	Yes	Amended recommendation to clarify.	1e
238	P48, Para 2: Fires have been an integral part of bushland management - the management committee should keep an open mind on the subject. Perhaps other methods (e.g. mechanical) of imitating fire behaviour could be investigated as a means of control of flammable weeds.	1	No	Mechanical methods of weed control are too destructive.	2d
239	P51, Para 4: Strongly encourage the investigation into aerial fire control using fresh water from dams.	1	No	See P52, Rec No 10.	2d
240	P51, Para 5: Support the continuation of current physical removal of plants rather than using chemicals to keep fire breaks clear.	1	No	Comment acknowledged. See Rec 21, P53.	2d
241	P51, Para 6: Mobile phones may be more suitable in some instances. However, two-way radios still maintain advantage of being able to broadcast important information during fire control situation.	2	No	Comment acknowledged. Two-way radio will still be used.	2d
242	P52, Rec No 12: It would be more appropriate to conduct research on the effects of fire before committing to a 10 year plan with the recommendation to exclude fire.	1	No	See Rec 12, P52; there is research information on the effects of fire. See Para 5, P48; fires lit by public will still continue.	2d

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243	P49, Para 4: Early detection and rapid attack will continue to play a major role in fire control in Kings Park bushland - consider this to be the most important part in fire control strategy.	2	No		2a
244	P49, Para 1 : Repeatedly degradation of the bushland is blamed on "too frequent fires". Pre-European fires are likely to have been more frequent than those since! The expression "too severe fires" would be preferable.	1	No	Pre-European use of fire is not fully understood. Intensity of fire is only one aspect of the fire equation.	2d
245	P48, Para 1: Prescribed burning ceased for aesthetic reasons. It was considered unacceptable in an urban park to have a quarter of the area reduced to a blackened ruin each year. Even so, it is a fact that in fire-prone vegetation, fire suppression as a policy is counter-active (see Minnich, 1983) and that fuel reduction burning may have reduced the impact of past wildfires.	1	No	Amended fire section for more information.	2d
246	P49, last Para: Sprinkler system sounds promising but in practice, once crown fires start there is no way of putting them out.	1	No	Sprinklers are a wet fire break, used in conjunction with rapid suppression.	2d
247	7.6 Feral Animals and Domestic Pets P53: CALM research presents evidence that foxes are main culprits in the demise of local fauna. Research is needed on the impact of local fauna by cats. Biological control should be considered.	2	No	Covered in Para 2, P53 and Rec No 2, P54.	2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
248	P53, Obj. No 3: Considers that an educational programme (recommendation 3) is the strongest , broad reaching recommendation towards the objective of minimising domestic dog and cat numbers. However, this is not much of an effort towards the objective.	1	No	See Obj. No 1 and Rec No 2.	2d
249	P54, Rec No 1: What sort of control programmes are going to be implemented to monitor control of feral animals - baiting, trapping, fencing? Recommendations need to be more prescriptive.	1	No	Recs. need to be flexible to ensure all methods are available, including yet undeveloped technology. See P53, last Para.	2d
250	P54, Recs: Rec No 4 is not strong enough. Cats should not be kept in Kings Park residences	1	No	Suggested Rec would be ineffective as suburban cats are just across the road. Unfair to responsible owners.	2d
251	P54 , Obj. and Recs: Fully support the objectives and recommendations of this section.	4	No		2a
252	P54, Recs: Strongly support these recommendations.	2	No		2a
253	P54, Recs: Specifically support the recommendations relating to cat curfews and compulsory sterilisation.	1	No		2a
254	P54, Recs: For Recs No 4 and 5 to be implemented effectively an education programme (Rec 3) will need to be developed in a comprehensive fashion.	1	No	Comment acknowledged.	2d
255	P54, Recs: Recs No 4 and 5 which relate to the introduction of a cat curfew and compulsory sterilisation are strongly supported.	2	No		2a

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256	P53-54: Do not agree that domestic dogs should be allowed in Kings Park and Botanic Garden; the only exception being guide dogs for the visually impaired.	1	No	Comment acknowledged	2d
257	P54, Rec No 4: Should be strengthened by stating that when residents cats die they should not be replaced . Sterilisation can be enforced by the rangers or staff of the Park but a cat curfew cannot.	1	No	Control methods can be maintained.	2d
258	P53, Para 4: In Australia <i>Streptopelia chinensis</i> is normally referred to as the Spotted Turtle Dove.	1	Yes	Standard texts refer to Spotted Turtle Dove. Common name changed.	1e
259	P53: Disagree with honey bees (feral?) being in any nature reserves due to adverse impact on native bees and the ineffective pollination of some native plant species.	1	Yes	Covered in P66, Obj. and Recs. Included a cross reference to 9.3 Beekeeping.	1e
260	P53: Education of the public as to the problems that feral animals and pets cause should be the first step taken in any control programmes. It may be useful to clearly state the real and potential health risks posed by these species (they are quite considerable).	1	No	Suggestion of health problems acknowledged. See Rec No 3, P54.	2d
261	P53, Para 3: Two species of bird need to be added to the list of feral animals - the Scaly-breasted Lorikeet (<i>Trichoglossus chlorolepidotus</i>) and the Little Corella (<i>Cacatua sanguinea</i>).	1	Yes	Amended plan.	1e
262	P53: Low numbers of Scaly-breasted Lorikeet will be difficult to control as they fly with the Rainbow Lorikeets. About 30-50 Little Corellas roost in the Lemon-scented Gums at the north-west corner of the Park. They should be eradicated as soon as possible while population numbers are low.	1	Yes	Information incorporated. Added Rec No 7, P54. "Where possible, eradication of feral animals should occur when population numbers are low and easily controlled".	1e

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263	P53: No provision is made for an active stray cat and dog reduction/eradication programme (trapping) within the Park and the attribution of this responsibility to existing Park staff - Rangers.	1	No	See last Para, P53 and Rec No 1.	2d
264	P53: Dogs should be kept on a leash at all times (this does not seem to be spelt out in the Plan).	1	Yes	Suggestion included.	1e
265	P53: The Plan is too weak regarding active cat control. Suggest you erect a cat proof fence around Kings Park, more attractive but similar to that at Thomson's Lake Nature Reserve. Cats within the enclosure should then be eliminated.	1	No	Considered not appropriate and impractical for heavily used urban park.	2d
266	P54, Rec No 1: No need to monitor feral animals and pets. Take all steps to eliminate them forthwith.	1	No	Scientific methods must be maintained for on-going control.	2d
267	P54, Rec No 3: Dogs on a leash could be banned from the Park with a small change to the by-laws or allowed in areas apart from bushland, playground and picnic areas. If bans or restrictions are made the Board should be ready to enforce such decisions.	1	No	Education programmes should be improved before bans are imposed.	2d
268	P53: The by-laws should be changed to accommodate the removal of animal excreta by animal owners. This might act as a deterrent to bringing animals entering the bushland. Removal of excreta is commendable for health reasons.	1	Yes	Amended Recs, P54 "Amend by-laws to accommodate the removal of animal excreta by owners".	1e
269	P54, Rec No 5: Supports liaison with Local Authorities but suggests that Local Authorities adopt the Recs before any State legislation is passed.	2	No	Positive relations with neighbours are important. Legislation is presently being reviewed.	2d

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270	7.7 Environmental Weeds P54, Rec No 13: Difficulties encountered with the cultivation of some local tree species may reduce the selection of trees for Honour Avenues to just Marri (<i>Eucalyptus calophylla</i>) or Casuarinas (<i>Allocasuarina fraseriana</i>). May be simpler to continue present practice of replacing senescent Avenue trees with Marri, weeding out seedlings of eastern states species.	1	No	Suggestion acknowledged.	2d
271	P55: Concern about the removal/control of Veld Grass, Bridal Creeper and Love Grass. Should be done as soon as possible.	1	No	See Rec No 5, P56.	2d
272	P 54: The Plan should be used as a guide for other land managers and community groups.	1	No	See Preface Pvii.	2d
273	P57, Rec No 14: Suggest extending this to schools programme. Children will be able to see positive outcomes from their actions.	2		See P87.	2d
274	P54: Chemicals for weed control should not be used in the bushland unless absolutely essential. Manual methods of removal should be given more consideration, such as scything and pulling.	2	No	Chemicals used only after trials and Health Dept. notification. See Obj. 2 and 3, Rec No 3 and 11.	2d
275	P54: Suggest there should be a voluntary Landcare group for Kings Park for weed control.	2	No	Suggestion acknowledged. See Obj. No 6, P54 and Rec No 14, P57.	2d
276	P55: Concern that weed list should acknowledge potential environmental weeds such as Tambookie Grass (<i>Hyparrhaenia hirta</i>).	2	No	See P54, Obj. No 1, Rec No 7. List of potential weeds would be too great for the plan.	2d

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277	P55: Bridal Creeper is easily removed by digging when soil is still damp and before seed is mature. Volunteers could remove the weed. Native rhizomatous species would not be at risk of chemical sprays.	1	No	For large infestations, soil disturbance would be unacceptable and damaging to native rhizomatous and other species. See Obj. No 2 and 3, P54 and Rec No 3.	2d
278	P 56, Rec No 4: Support the recommendation. Liaison with neighbours is of prime importance for education and control of weeds in an integrated programme	2	No		2a
279	P57, Rec No 13: Supports the Recs. An avenue of Tuart would be a grand spectacle, also providing nectar and nesting sites for local birds.	2	No	Comment acknowledged.	2a
280	P57, Rec No 15: Supports the recommendation. Also encourage the Government to give priority to the Bill on the Control of Environmental Weeds.	2	No	Beyond the scope of the plan.	2c
281	P56, Rec No 6: If the vegetation of the escarpment were to be excluded from the bushland, would <i>Agave americana</i> be so objectionable?	1	No	Escarpment is an important component of the bushland. See P33, point 1.	2d
282	P57, Rec No 13: Appears the use of native trees in Avenues is over emphasised.	1	No	Only Rec No 13 refers to Avenues.	2d
283	P54: The weeds section of the Plan should be given the highest priority. Its implementation should involve community groups and schools.	1	No	See Rec No 14, P57.	2a
284	P56, Para 1: Should "Carr 1992" be "Carr et al. 1992".	1	Yes	Amended plan.	1e

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285	P54, 56-57, Obj. and Recs: Supports the objectives and recommendations.	3	No		2a
286	P56, Rec No 5: Rec 5 should be given priority.	1	No	See P103 -High Priority.	2d
287	P56, Obj.: All objectives are highly recommended.	1	No		2a
288	P55, Para 4: Encourage the speedy removal of woody weeds.	1	No	See Rec No 5, P56.	2d
289	P55: Suggest more research on Veld Grass. Its success may be due to eutrophication, enrichment in nitrogen due to fall-out from air pollution. Control may not be possible .	1	No	Comment acknowledged. See Rec No 15. P57.	2d
290	7.8 Bushland Restoration P 59, Para 1: For the sentence "structure, density and floristic composition", omit the word "density", as density is a component of structure.	1	Yes	Amended plan.	1e
291	P 59: Vegetation Condition Scale refers only to vegetation structure in its various definitions of classification and nowhere is floristic composition or association explicitly mentioned. It may be implied but should be explicitly included.	1	Yes	Reworded to clarify "Structure" includes floristic composition and association.	1e
292	P 59: Does the Vegetation Classification Scale "Good" mean no action should be taken to remove weeds?	1	No	No, weeds have to be removed. See Section 7.7 Environmental Weeds, Para 1, P55 and Rec No 7, P56.	2d
293	P57, 61-62 , Obj. and Recs: Supports the objectives and recommendations.	1	No		2a

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294	P61, Para 2: It is important to ensure during revegetation, that plants or seeds are placed in areas where plants would have naturally occurred.	1	Yes	Suggestion incorporated. "even spacing and planting in rows and to ensure placement of plants is consistent with where they would naturally occur. This will help to ensure a natural effect is achieved."	1e
295	P 61, Rec No 4: Reintroduction of plant species that have become extinct due to fire (<i>Banksia ilicifolia</i> and <i>A. humilis</i>) is welcome. Active rehabilitation in concurrence with the weed eradication programme should be implemented.	1	No		2a
296	P62, Rec No 10: Agree some revegetation is needed but I would not like it to be inhibited by having to accord with the Management Plan.	1	No	Plan is designed to protect the ecological integrity of the bushland. All areas are significant.	2d
297	P61-62, Recs: Strongly support the recommendations. Add "Immediate closure of tip sites 1 and 2".	1	No	Flexibility needed as funding is limited and alternative areas have to be agreed upon.	2a
298	P57: Renewed efforts at eucalypt re establishment in the bush are commendable but protection of young trees from wildfires is still a problem. Suggest plants could be protected from fire damage by mowing around them in early summer to about 2m radius. Stocking rates of eucalypts, as suggested in Beard, 1967, would be 12 trees/acre (30/ha). Thinning of the Banksia-Casuarina population must occur for the strategy to succeed.	1	No	More research required regarding stock rates. Previous fires have killed young trees.	2d

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299	P57-58: Question some of the assumptions, particularly in Objective No 1 and in the statement in the last paragraph of that page that "on the whole, natural plant communities will regenerate naturally and are resilient if managed properly". Believe that the reversal of the decline in the bushland demands more disturbance i.e. human intervention, not less, and would not occur naturally under a policy of laissez-faire.	1	No	Management style will not be laissez-faire.	2d
300	P57: One of the primary problems of restoration is the delineation and separation of bush from other areas e.g. lawns, garden beds. Essential to create physical barrier to plants especially grass, e.g. fencing, narrow paving and curbing.	1	No	See P61, Rec. No 7.	2d
301	P61, Recs: Recs 3 and 5: These activities should be extended to include school children.	1	No	See P85-88.	2d
302	P61, Para 3: Relocation sites of rubbish tips should be identified.	1	No	Beyond the scope of the plan.	2c
303	P61, Rec No 7: Methods of delineation/barriers separating bushland areas should be stated.	1	No	Flexibility required as funding is limited and new methods may arise in the near future.	2d
304	P58, Para 3, point 8: Read as "timber removal (logging and removal of dead trees) without regeneration".	1	No	Past logging has caused disturbance simply by removing mature trees.	2d
305	8.0 CULTURAL RESOURCE MANAGEMENT Supports this section.	1	No		2a

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306	8.1 Aboriginal Heritage P63, Recs: Supports the recommendations. Interpretation programmes for Rec 3 should also include information on the environmental wisdom of Aboriginal people. The Park could play an important role in educating and improving the community's attitude towards aboriginal culture.	1	No	History includes social as well as political aspects of Aboriginal life.	2d
307	P62, Rec No 1: Eliminate comma after <i>Nyungar</i> people.	1	Yes	Amended plan.	1e
308	P 63, Obj. and Recs: Support the Objectives and Recommendations.	2	No		2a
309	P62: Aboriginal should be spelled with a upper-case 'A' .	1	Yes	Amended plan.	1e
310	P63, Rec No 2: Should be more than consultation with <i>Nyungar</i> people. Their involvement in bushland management should be encouraged.	1	Yes	Reworded to clarify meaning "consult and involve Nyungar, especially...on matters of cultural interest."	1e
311	8.2 Post Settlement History P , Obj. and Recs: Supports the objectives and the recommendation .	2	No		2a

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312	P63, Para 4: Amend to read "Kings Park, originally Reserve on Mount Eliza, then Reserve 1720, subsequently Perth Park, was first gazetted (in part) in 1872 and approximating to its present area in 1890. It was declared an "A" Class Reserve on 23 March 1900." "Management of the Park was guided by an unofficial committee from about 1890, which recorded its first minutes a month before passing of the Parks and Reserves Act 1895. The committee was gazetted as Perth Park Board on 24 January 1896 and as The Kings Park Board on 27 December 1901. Control of the Park is vested in the Board".	1	Yes	Amended plan.	1e
313	P63, Para 5: Either delete "(from Mount Eliza)" or amend to read "(from the escarpment of Mount Eliza and Quarry Point)". This is an old problem of what is meant by Mount Eliza, then and now.	1	Yes	"Mt Eliza" omitted.	1e
314	P63, Para 5: Amend to read "1836" (1835 was a typographical error in earlier notes).	1	Yes	Amended plan.	1e
315	9.0 RESOURCE MANAGEMENT 9.1 Extraction of Raw Materials P64, Rec No 1: Notes Parks and Reserves Act as amended prohibits permits to extract for sale minerals etc unless that is an original or gazetted purpose of the reserve.	1	No	Comment acknowledged.	2b
316	P64, Para 2: "In accordance with current Government policies" should be rewritten because a) it is incorrect and b) unduly optimistic. The optimism is unwarranted given the amount of ministerial discretionary decisions we are witnessing today.	1	Yes	Omitted para. Added Rec No 3.	1e

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317	P64, Para 7: Agree that exploration or mining is unlikely to be approved in Kings Park. This is likely to be as a result of public outrage to any suggestion of exploration or mining in the Park. Exploration or mining has already been allowed in three National Parks under the current policy.	1	Yes	See previous comment and Rec No 3.	1e
318	P64, Rec No 1: Of the opinion that for all the obvious reasons, a complete ban on mining of any description in Kings Park should be legislated by State Parliament.	2	No	Beyond scope of plan. See Rec No 3.	2f
319	P64, 65, Recs: Strongly support all recommendations.	2	No		2a
320	P64: Require additional recommendation to support the concept of referring proposals that may have some impact on the bushland to the EPA for formal assessment with public input.	1	Yes	Added recommendation, Rec No 3. "Refer any proposal for raw material extraction to the EPA for formal assessment with public input."	1e
321	P64, 65, Obj. and Recs: Strongly support the objective and recommendations	2	No		2a
322	9.2 Utilities and Services P65-66, Obj. and Recs: Strongly support the objectives and recommendations.	3	No		2a
323	P65-66, Recs: Require additional recommendation to support the concept of referring proposals that may have some impact on the bushland to the EPA for formal assessment with public input.	2	Yes	Added recommendation, Rec No 6. "Refer proposals for new services within the bushland to the EPA for formal assessment with public input."	1e

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324	P65, Existing Arrangements: Is Optus relevant to the guidelines proposed or in existence under this heading?	2	No	Are relevant. Will be sent guidelines.	2d
325	9.3 Beekeeping P66, Rec No 2: What about existing feral (honey) bees nests in bushland?	1	Yes	Added information and recommendation to 9.3 Beekeeping.	1e
326	P66, Recs: This section fails to address the problem of feral bees. Suggest a third recommendation "Encourages and sanctions the removal of feral hives in tree holes of Kings Park". No point in waiting for the outcome of scientific studies.	1	Yes	Recommendation adopted.	1e
327	P66, Obj. and Recs: Strongly support the objective and recommendations. Beekeeping in proximity to the Park should also be discouraged.	2	No		2a
328	P66: This section on Beekeeping refers to Section 7.6, but there is no mention of honeybees in that section, or in the text on invertebrate pests on P 45-46.	1	Yes	Delete reference to Section 7.6. Added information to Section 7.4 and recommendation to Section 9.3.	1e
329	PART D. MANAGEMENT FOR RECREATION 10.0 PRINCIPAL RECREATION DIRECTIONS Agree with the goals as outlined.	2	No		2a

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330	P69, Recreation Management Philosophy: Could be worded more positively e.g. "seek to facilitate nature based recreation in the Park and to ensure visitors enjoy the bush and learn to appreciate it".	1	Yes	Amended plan.	1e
331	11.0 RECREATION OPPORTUNITIES P69-81: General support for this entire section.	2	No		2a
332	P69-81, Obj. and Recs: All objectives commendable. Strategy recognises the inherent dangers of parks becoming too popular. This threat needs to be monitored closely.	1	No		2a
333	11.1 The Region P69: Add "Nature Appreciation" as distinct from bushwalking. (See 14.1 and eliminate that sub-section).	1	No	Activities cited on P69 are only examples of nature appreciation activities.	2c
334	P69,70, Obj. and Recs: Support objectives and recommendations.	2	No		2a
335	P70, Rec No 2: Note existing arrangements to book facilities in Kings Park and to redirect if necessary to reduce overcrowding.	1	No	Comment acknowledged.	2c
336	11.2 The Bushland P71, Para 2: Amend to read "travel along Mounts Bay Road, Kings Park Road and Thomas Street, but only one bus service enters Kings Park (No. 33), it usually terminates near the State War Memorial (or restaurant) but extends into bushland parts of Kings Park all day on Sundays and public holidays and Saturday afternoons."	1	Yes	Amended plan.	1e

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337	P 70, 72, . Obj. and Recs: Support the objective. Recommendations should also include the monitoring of recreational impacts on the environment.	1	Yes	Added new Rec. "Investigate and monitor recreational impacts on the environment."	1e
338	P71: Figures used are ambiguous. Do numbers stated refer to the average daily /site or to the total over the four days?	1	Yes	Amend to include "the total number of visitors."	1e
339	12.0 ACCESS P72, Obj. and Recs: Support the objectives.	1	No		2a
340	P72, Para 2: Delete "Altona" and substitute "Outram".	1	Yes	Amended plan.	1e
341	P73, Para 1: Change text so that Forrest Drive is not mentioned as the "major" road used. Fraser Avenue is the major road used , followed probably by May Drive then Forrest Drive and Lovekin Drive.	1	Yes	Amend to mention Forrest's views etc but not "most" used.	1e
342	P73, Para 1: (and P79, Para 2) The estimate of 2 million vehicles per year in 1974 (Johnson et. al., 1975) is now known to be in error. We may reach the 2 million mark in 1994.	1	Yes	Omitted reference to estimate and added directions of traffic flow through the park (P79).	1e
343	P73, Rec No 3: Until the Veld Grass/fire hazard self-perpetuating cycle is resolved, small parcels surrounded by vehicle accessible tracks have merit in use of efficient tractor mounted sprayers/misters to apply herbicides and of effective fire-fighting vehicles. Some superfluous paths may be needed to provide parallel alternative routes to allow more foot and cycle traffic separation. Many joggers and runners prefer sand tracks to hard surface and may need separate provision.	1	No	Pathways will be considered for all their values. Comments acknowledged.	2d
344	P73, Para 4: Amend text to show that not all paths are accessible to cyclists.	1	Yes	Amended plan accordingly.	1e

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345	P73, Para 7: "exits" should read "exists".	1	Yes	Amended plan.	1e
346	P73, Para 8: "Bridal" should read "bridle".	2	Yes	Amended plan.	1e
347	P74, Rec No 2: May well be indicated that this is present policy and practice, legally enforceable under the by-laws, and the requirement of the by-laws to observe the provisions of the Road Traffic Code and Traffic Act.	1	No		2d
348	P74, Rec No 5: See above Comment No 253. Amend recommendation accordingly.	1	No	Pathways will be considered for all their values.	2d
349	P74, Rec No 7: Note that the Board may be held liable for accidents arising from speed dips (traffic calming devices).	1	No	Comment acknowledged.	2d
350	P74, Rec No 9: Acknowledge Perth's Free Transit Zone, support its continuance, which may be threatened by cost-cutting measures.	1	No	Beyond the scope of the plan.	2c
351	P72: Restricting access by night time closure of the Park would make it safer and reduce litter and vandalism.	1	No		2d
352	Ensure that there are seats (even if they are only large logs) along most of the roads in the Park. Elderly visitors require rests at regular intervals.	1	No	Some seating is available. Issue is currently under review.	2d
353	P74, Rec No 7: Traffic calming devices for cycles must be effective, giving consideration to the distance between speed dips etc.	1	No	Comment acknowledged.	2d

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354	P72: Kings Park is frequently used for recreation by groups of people with disabilities. It is requested that full consideration be given to the needs of these people and to improve access and facilities for them, as there are significant improvements needed.	1	No	Comment acknowledged. See Obj. No 2, P72 and Rec No 4, P74.	2d
355	P73, Para 5: Priority should be a sealed track from car park A down to Law Walk, with a developed area by the car park.	1	No	Comment acknowledged. See Section 6.2, P24-25.	2d
356	P73: Although reference is made to walkers and cyclists, a large number of users are joggers/running clubs. These people do no harm but orienteering should be prohibited.	1	No	All activity conducted on designated pathways, Rec No 2, P77.	2d
357	P74, Rec No 9: This is of some concern due to the fragility of the bushland.	1	No	See rec No 2, P77.	2d
358	P70, Rec No 2: One would have thought this would be deemed not relevant because any invading or invasive group activity surely has been directed for years towards the non-bushland zones of the Park.	1	No	Conflict still occurs. Further education required.	2d
359	12.1 Car-Parking P74, Obj. and Recs: Support the objectives.	1	No		2a
360	P75, Para 1 and Rec 2: Kings Park By-Laws allow any disabled person with or without an ACROD permit to park in bays reserved for disabled people.	1	No	State legislation is to be created to recognise interstate and overseas stickers, currently not recognised.	2d
361	13.0 BUSHLAND RECREATION P76, Para 5: Wildflower Nodes are an excellent idea.	1	No		2a
362	P75, 77, Obj. and Recs: Support the objectives and recommendation.	1	No		2a

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363	P76, Para 8: Do we really want them to leave foot prints? How about Dame Frost's "A good mother takes her litter home".	1	No	Suggestion acknowledged.	2d
364	P76, Para 4: Bear in mind the vandalism to signs erected along the Nature Trail etc in the 1980's.	1	No	Comment acknowledged.	2d
365	P 76: The area presently used for the Guided Nature Trail Walks becomes increasingly degraded by people leaving the designated paths. Stricter rules need to be made concerning walking, especially encouraging guides to adhere to them. Alternative routes could be used from time to time to reduce impact.	1	No	See Rec No 2, P77 and Rec No 1, P87. Suggestion acknowledged.	2d
366	P76, Para 5: Wildflower nodes could be a problem. Perhaps one could move the more curious and interested visitor into the low-impact zone around and in the bush arboretum (See 14.5 and Pp 87 and 88).	1	No	See Section 14.5, P79-80.	2d
367	P76: Observe that the possibility of new recreation sites is allowed for on page 76 under recreation site management but on page 77, these must be consistent with the maintenance of the bushlands natural character which is restrictive. Feel there should be allowed room for increasing size of present lawned areas to cater for increased demand.	1	No	Representative areas of local bushland are rare. Active recreation and picnicking can be enjoyed in public areas besides Kings Park.	2d
368	P76: Change "interpretive" to "interpretative" and elsewhere in the document	1	No		2d
369	P76, Rec No 5: Strongly supported.	1	No		2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
370	14.0 RECREATION ACTIVITIES P77: Support the criteria laid down to determine the accessibility of recreational activities. Where disagreement occurs about the impact of a particular recreational activities on bushland, the issue should be referred to the EPA for consideration and public input.	1	No	Adequate scope to control inappropriate activities.	2d
271	P77: Never allow organised sports in the Park. There are plenty of ovals nearby.	1	No	The plan encourages passive recreation. See P70, Para 1.	2d
372	14.1 Nature Appreciation P77: Support the objective and recommendation. Fresh and innovative ways of facilitating visitor appreciation of the bush should be considered.	1	No	Suggestion acknowledged.	2a
373	P78, Para 1: "provided" should read "provide". Apart from vandalism excessive sign posting is a common cause of visual pollution	1	Yes	Amended plan. See Section 6.4, P32, Rec No 2, point 6 and Section 15.	1e
374	14.2 Bushwalking P78, Para 4: The Board permitted orienteering in Kings Park provided that only existing paths , grass areas, road side tables etc were used. At first the organisers said it could not be done, but it was done.	1	No	Comment acknowledged.	2b
375	P78, Para 7, point 3: The footpaths on the scarp are legally closed by signs to cyclists. Is enforcement lacking? If so and it cannot be improved, many of the suggestions in the draft plan about who can do what are rather pointless.	1	No	Comment acknowledged.	2d
376	P78, Obj. and Recs: We support the objective and recommendations. Are in support of offering bushwalking opportunities provided the bushland is not adversely affected.	1	No	See Rec No 2, P77.	2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERION (PAGE 1)
377	14.3 Cycling P78, Obj. and Recs: Agree with the objective and recommendations	1	No		2a
378	P79, Rec No 3 and No 4: Deserve high, not medium, priority.	1	No	Public education and community relations need improving before introduction of structural changes.	2d
379	P79, Rec No 2: Paths should not be used for high-speed cycling because of danger to others.	1	No	See Rec No 3 and 4, P79.	2d
380	P79, Rec No 2: Some cycle clubs use dual paths very responsibly and more would do so if there was communication with them. These are exactly the people whose cooperation should be fostered to set a good example. Telling to keep out will not achieve that (note orienteering experience).	1	No	Large groups conflict with other users. Roadways are available.	2d
381	P79, Rec No 1: What is passive cycling? Note the by-laws empower the Board to designate paths exclusively for either pedestrians (including wheelchairs, perambulators, etc) or for cyclists, and "recreation paths", for use by both, these latter equate to the "dual use" paths of the Road Traffic Code, with whose regulations the Board's By-laws require compliance.	1	No	Casual recreational use. Information acknowledged.	2d
382	P79, Rec No 3: Note Occupiers Liability and also liability if accident was to an employee travelling to and from work.	1	No	Comment acknowledged.	2d

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383	P79, Rec No 4: Instruction of school age cyclists by Bikewest et. al on the Hale Recreation Area, bicycle training track is a community opportunity to teach safe cycling within and outside Kings Park. Should be acknowledged and encouraged.	1	No	Suggestion gratefully acknowledged.	2d
384	P78, Recs: A recommendation should be added to ensure that cyclists who use Lovekin Drive should know that pedestrians cross the Vista so that they can be alert to pedestrians at this point of the road. Serious accidents can and have occurred in the Park with speeding cyclists.	1	No	Roads in Kings Park are gazetted and normal road rules apply.	2d
385	P78: Cyclists training for competitive events should not be allowed in the boundaries of Kings Park.	1	No	See above comment.	2d
386	P79, Rec No 3: Could traffic calming devices e.g. speed dips, be installed on Lovekin Drive where it intersects the Vista?	1	Yes	Added recommendation to P74 "To improve safety road modifications should be investigated."	1b
387	P78: Cyclists and pedestrians do not mix. Pathways should be designated either for pedestrians or cyclists (cycleways). Cyclists should be encouraged to use the main roads.	1	No	See Rec Nos 1-4, P79.	2d
388	14.4 Pleasure Driving and Sightseeing P79: Such activities are incompatible, nonsense and should be deleted. This promotes careless driving habits. In addition it smacks of CALM influence. That department also promotes cars instead of people walking, by bituminising even more roads in National Parks and reserves.	1	No	Few accidents from these activities recorded in the Park, reflecting responsible driving. Park speed limit is 40km/hr.	2d
389	P79, Para 3: The quote of 2 million vehicles per year needs to be amended/clarified.	1	Yes	Omitted quote.	1e

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390	P79, Obj. and Recs: Support the objective and recommendations, particularly the speed limit of 40 km/hr. This should be strictly enforced.	1	No		2a
391	P79: How about mentioning the need to keep views of the river open?	1	No	Fraser Avenue has views of river and city.	2d
392	14.5 Wildflower Nodes P79-80: Support the rationale behind the promotion of wildflower nodes and the recommendations.	1	No		2a
393	14.6 Barbecuing and Picnicking P80, Para 1: Educating public to bring picnic - not expect BBQ Use wood burning BBQ as object lessons in traditional renewable, versus fossil fuels, and in the responsible use of fire.	1	No	Comments acknowledged. Gas/electric BBQs provide better service in hotter months, when wood BBQs are banned.	2d
394	P80, Obj. and Rec : Support the objective and recommendation.	1	No		2a
395	P80: Prefer that only electric and gas BBQs are made available, so that wood from the bushland is recycled within the bushland.	1	No	See Rec No 1, P80.	2d
396	P80: The spelling of barbecue should be preferred. Barbeque suggests a French word, which would however be pronounced barbeck. The derivation appears to be from the Spanish 'barbacoa'.	1	Yes	Amended plan.	1e
397	P80: Fallen logs should be left in the bushland to provide the necessary habitat for fauna. Electric and gas BBQs would definitely save habitats and also lessen the probability of bushfire	2	No	See Section 7.5 P51. Where possible, dead trees from the edges are returned to the bush.	2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FINAL PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
398	15.0 SIGNS P81: Signs are very expensive, e.g., the City of Stirling recently installed signs at a cost of \$2 000 each therefore great care should be taken to not overdo this.	1	No	Comments acknowledged.	2d
399	P81, Objective: While accepting the potential of interpretative signs and bearing in mind the likely need for "safety" signs, with respect to Occupiers Liability, there is a risk of saturating the observer so that less is taken in. There is also the problem of visual pollution, often leading to vandalism. Therefore consider alternative methods as far as possible, e.g. preconditioning visitors by orientation in visitor or education centres or by prior visits to schools, and even substitute experiences in centres.	1	No	Suggestions acknowledged. See Recs. P81.	2d
400	P81: Note that the new CALM Sign Manual excludes the use of rainforest timbers (Nyathlo) the timber that was used by the Park in the sign at the Sawpit display	1	No	Information acknowledged. Ethics to be considered in site/work plans.	2d
401	P81, Obj. and Recs: Support the objective and recommendations.	1	No		2a
402	P81: Signs that seek to control human activity are often very brief and without explanation. People are more likely to obey these signs if they justify the request, i.e., if a brief explanation of the consequences of not obeying the sign is also given.	1	No	Positive encouragement through education is more appropriate. Interpretive signs can accommodate such explanations	2d
403	PART E. INFORMATION, INTERPRETATION AND EDUCATION P85: Fully support the section.	1	No		2a

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404	P85-88: This section is of particular interest to our school students as it seems that future involvement of children in developing practical knowledge of some elements of conservation management may eventuate, following the implementation of recommendations.	1	No	Interest in community involvement is acknowledged.	2a
405	P85-88: A useful addition to this chapter is required. Visitors need to be able to recognise differences between some of our major tree, shrub and understorey species before being able to appreciate the natural environment. Changes to this effect should be made in the objectives, recommendations or text.	1	No	Brochures currently available on native plants. Current Obj. and Recs cover improved education/interpretation. See Rec No 3.	2d
406	16.0 INFORMATION, INTERPRETATION AND EDUCATION P85-88: Public education, especially to migrants, is of utmost importance. This will overcome fears (killing anything that crawls) and misunderstandings about our fauna and the continued misconception of planting exotics to 'beautify' our bushland.	2	No	Comments covered by Obj. and Recs. See Rec No 3.	2d
407	P85-88: Development of an education/awareness programme is welcome to enable visitors to gain an understanding of the unique values of the bushland. This should include botanical and bird walks with interpretation material on the various plant communities within the Park. It complements the policy to encourage visitors to remain on marked paths to avoid trampling.	1	No		2a
408	P86, Para 6: An audio-visual display in the Education/Information Centre using video/interactive computer software, slides, tapes of bird songs, etc would be a focal point to raise public awareness on Kings Park bushland values	1	No	Suggestion acknowledged. See Rec No 9, P88.	2d
409	P87-88, Recs: Support the recommendations.	2	No		2a

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410	P86, Para 1, sentence 2: Strongly support these approaches.	1	No		2a
411	P87, Para 3: "Other sites" strongly supported. However, it is also important to use existing tracks, such as fire trails, in the bushland for curriculum based experiences. These could be monitored as an ongoing educational program.	1	No	Use suggested sites, unless specialised tours are arranged.	2d
412	P88, Rec No 6: This is very important. Liaison with centres of higher education to help develop programs sympathetic with these educational aims is important. This would also help to educate future teachers and workers in this philosophical framework.	1	No	Comment acknowledged.	2a
413	P88, Rec No 9: It would be a wonderful long-term aim to set up an Environment Centre in the Park to serve these aims. Perhaps the Education Centre could be renamed and used in that capacity, it is both a more attractive name and a more appealing activity.	1	No	Suggestion acknowledged.	2a
414	P85, Objectives: Support the objectives.	2	No		2a
415	P85-87: Fostering a sense of stewardship (ownership) and pride in the Park by the community cannot be over emphasised.	1	No		2a
416	P87, Rec No 2: An increase in Interpretative staff in Kings Park, would be welcome. Education, including environmental education, is the responsibility of the Ministry of Education. Should be encouraging the Ministry to provide school teachers.	1	No	Comment acknowledged.	2d

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417	P88, Rec No 9: Toilets will be difficult to install in the present Education Centre. Wheelchair access and parking will be difficult to improve. The rock storage site (2 on Map 8) is a possible new location, although moderately long, new service lines would be needed and presumably another septic tank.	1	No	At present this is the most cost-effective option. See Map 8, P60, Rec 9, P62.	2d
418	P85, Obj. 1: Should include some way of warning visitors not to go alone into the bush. e.g. information could be included in pamphlet material etc.	1	No	Covered by Obj. No 1. Suggestion acknowledged.	2d
419	P86: Para 3, Visitor Information should come before Education. i.e. after present paragraphs 4 and 5.	1	Yes	Amended plan. See P85, Para 4.	1e
420	P86, Para 4: "Many", not "most" plants are labelled.	1	Yes	Reworded to clarify.	1e
421	P86, Para 7: Surprised that an Education Manager is advocated. Policy could be arranged by an active education officer in consultation with the Director.	1	No	Policy manager needed for whole of Park, not just bushland.	2d
422	P87, Rec No 4: Staff need to wear more prominent badges or clothing in order to maximise contact with visitors	1	No	Uniforms now provided.	2d
423	P88, Rec No 9: It would be uneconomic for an Education Centre to serve only the bushland.	1	No	A centre is needed. Services for other areas are beyond the scope of the plan.	2d
424	P88, Rec No 10: Opposed to the "old" bush arboretum and small area by the Nurseryman's cottage being used for bushland purposes. Feel educational areas should be in the main body of bushland e.g. by the Pines. Area should be fenced and used as display area for large vertebrates once native to the Park. Arboretum trees should be protected from damage by the animals.	1		See Para 2, P87. Area suggested for fencing in large vertebrates has uncommon species that would get damaged.	2d

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425	P85: It should be clarified whether visitors may take items from the ground.	1	No	Covered in the By-laws. See Rec Nos 1 and 3.	2d
426	P86, Para 7: Agree strongly that an Education Manager and an Education Officer be employed on a permanent basis.	1	No		2a
427	P88, Recs: Suggest a further recommendation: The school education system introduce into the curriculum as a matter of urgency Urban Environment (natural and built), and our relationship to it.	1	No	Liaison with Education Department is a role for the proposed Education Officers.	2d
428	P95, Rec 2: Do not support this recommendation. Have enough policies and strategies at present and only need action on the ground.	1	No	This Rec is vitally important if the plan is to succeed.	2d
429	PART F. RESEARCH AND MONITORING 17.0 GOALS FOR RESEARCH AND MONITORING P92, Obj. and Recs: Support the recommendations.	1	No		2a
430	P91-92, Obj. and Recs: Support the objectives and recommendations.	2	No		2a
431	P92, Para 4: Upon completion research material should be made publicly available.	1	Yes	Amended plan.	1e
432	P92, Recs: Suggest inclusion of a recommendation to continue practice of applying strict guidelines to research projects.	1	No	Suggestion is already standard practice when applying for a research permit.	2d

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433	PART G. IMPLEMENTATION OF THE PLAN 18.0 STAFF AND FUNDING P96, Rec No 8: Free access to urban parks and gardens is the safety net of public recreation in the sense of physical and spiritual refreshment. It should not be rationed by the ability to pay or means testing. Environmental Education is too important to be made available in such a manner to school children.	1	No	Investigations will determine best, if any, applications of "user-pays" principle.	2d
434	P95, Recs: Support the recommendations.	2	No		2a
435	P95-96, Obj. and Recs: Support the objectives and recommendations.	1	No		2a
436	P95-96, Rec No 2: Support the position of Bushland Manager and assistants but not that of Education Manager.	1	No	Manager position required for policy needs at Corporate level.	2d
437	P95: The justification and role of the Bushland manager and support staff need expanding.	1	No	This area represents two thirds of Kings Park and Botanic Garden and has no dedicated staff.	2d
438	P95-96: Unless there is adequate funding to implement the plan, the excellent initiatives will flounder.	3	No	See Rec No 6.	2d
439	P96, Rec No 7: On an ethical basis, caution external funding from mining and forestry corporations and controversial environmental operations.	1	No	Sponsorship policy covers whole of Park, not just bushland. Comments acknowledged.	2d
440	P95-96: Consider introducing \$2 entry fee for vehicles to help fund park maintenance	1	No	To be investigated, see Rec No 8.	2d

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441	P96, Rec No 3: Surely current staff can be suitably informed by supervisors to conduct work in bushland areas.	1	No	See P95, Para 2. Currently no dedicated staff with bush skills.	2d
442	P96, Rec No 8: Possible corporate funding should be explored, as well as buying "shares" as well as annual subscriptions for specific projects.	1	No	Suggestions acknowledged.	2d
443	P96, Rec No 5: Suggest a circular be sent to all nearby households asking for volunteer rangers for work in bushland areas.	1	No	Suggestion acknowledged.	2a
444	19.0 LIAISON P97, Recs: Strongly support the recommendations of this section.	1	No		2a
445	P96-97, Obj. and Recs: Support the objective and recommendation.	2	No		2a
446	20.0 EVALUATION AND REVIEW P97, Recs: Strongly support the recommendations of this section.	2	No		2a
447	P97: Any changes made to the Plan which may adversely impact on the bushland must be released for public comment.	1	No	See P97. Major changes to the plan will be released for public comment.	2d
448	21.0 PRIORITIES P98, Recs: Strongly support the recommendation of this section.	1	No		2a

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449	P98-112: Table 5 is confusing. One has to read all the table to realise its just all the recommendations brought together! Might be better to indicate Priority rating by the item throughout the text.	1	No	See P98, Para 1. Kept as separate table for quick reference.	2d
450	P98-112: Support the priorities as proposed in the plan.	1	No		2a
451	P98-110: There are too many high priority recommendations for implementation, given the money and human resources that are likely to be available.	2	No	Corporate and other funding will be investigated before compromising standards.	2d
452	P98,103: Appears to be a gap in importance between recommendations e.g. 6.2 Rec 1 is way down the list compared to 7.7 Rec 2.	1	No	All are same priority. Listed according to Section headings.	2d
453	P97: There is little discussion of either the provision of resources or the time frame for objectives.	1	No	Will be largely influenced by funding. Site plans will be more specific.	2d
454	P110, Section 21, Rec No 1: Delete "require", substitute "report" This report should be made available for public inspection.	1	Yes	Text corrected to match P98, Rec No 1. Suggestion acknowledged.	1e
455	P111, Section 13, Rec No 5: Path naming should be given a high priority, as it is mentioned several times as a precursor to commencement of some programs.	1	No	See Section 15, Section 4 and Section 12 - all High Priority.	2d
456	P120, appendices, Para 2: Why was the period of public submissions reduced to 2 months?	1	No	Normal period for submissions is 2 months; we aimed for 3, but time restrictions prevented such.	2d

APPENDIX 1.

Submissions to the Draft Management Plan

Individuals	T. Ash M. Ashforth D. Bates J.S. Beard A. Burbidge B. Carter R. J. Cunningham W. M. Duyker J. Fisher A. Forbes A. Gardner N. Gibson and K. Brown J. Hawkes R. N. Hilton D. F. James Emeritus Professor A. R. Main W. F. C. Martin J. Monks B. Morgan C. Mowdy O. Mueller G. Owen R. Powell B. Rhind K. Sarti J. A. Spencer C. H. Stowasser M. & S. Telford R. Underwood R. A. Walker Dr Patricia Weaver P. R. Wycherley
Community Organisations	Bungendore Park Management Committee Conservation Council Inc National Threatened Species Network The Tree Society (Inc) Urban Bushland Council (WA) Western Australian Forest Alliance Waterbird Conservation Group Inc.
Political Parties	The Greens (WA).
State Government	Agriculture Protection Board of Western Australia Environmental Protection Authority