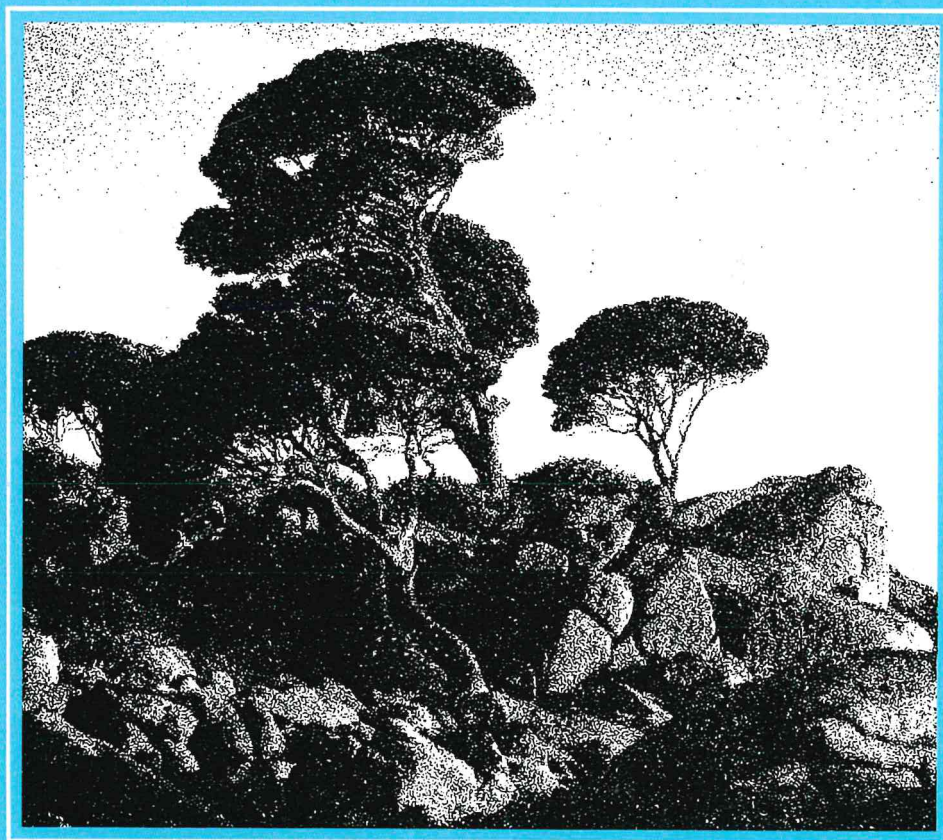


# Leeuwin-Naturaliste National Park

---

## Summary of Public Submissions

---



MANAGEMENT PLAN NO. 13



Department of Conservation  
and Land Management



# **LEEWIN-NATURALISTE NATIONAL PARK MANAGEMENT PLAN**

**SUMMARY OF PUBLIC SUBMISSIONS**

**NOVEMBER 1988**

**BY**

**KATE ORR and PAUL FREWER**



Department of Conservation and Land Management  
State Operations Headquarters  
50 Hayman Road  
Como W.A. 6152

**MANAGEMENT PLAN No. 13**

# CONTENTS

## PART 1

INTRODUCTION .....	5
--------------------	---

## PART 2

ANALYSIS OF PUBLIC SUBMISSIONS .....	6
Table 1: Summary of Choices to Recommendations in the Draft Management Plan .....	7
Statistical Summary of Submissions .....	13

## PART 3

SUMMARY OF PUBLIC SUBMISSIONS .....	14
1.0 Introduction .....	14
2.0 Land Tenure .....	15
3.0 Physical Environment .....	15
4.0 Biotic Environment .....	16
5.0 Marine Environment .....	17
6.0 Cultural Environment .....	17
7.0 Conflicts, Constraints and Opportunities .....	18
8.0 Objectives .....	19
9.0 Land Tenure .....	19
10.0 Management Units .....	20
11.0 Land Management .....	20
12.0 Cave Management .....	21
13.0 Vegetation .....	21
14.0 Fauna .....	22
15.0 Protection .....	22
16.0 Aboriginal and Historic Sites .....	24
17.0 Access .....	24
18.0 Recreation and Tourism .....	28
19.0 Education and Research .....	33
20.0 Resource Management .....	34
21.0 Marine Environment .....	37
22.0 Park Administration .....	38
23.0 Associated Land Uses .....	38
24.0 Research and Monitoring .....	39
25.0 Priorities .....	39
26.0 Funding .....	39

## **PART 1 INTRODUCTION**

The draft management plan (DMP) for Leeuwin-Naturaliste National Park was released by the Hon D. Wenn on December 11, 1987, at a public meeting at Conto's Field in the Leeuwin-Naturaliste National Park. It was announced that the plan was available for comment until 26 February 1988. This was extended until 11 March 1988, to accommodate the number of respondents who felt that the depth and scope of the report required extra time to collate a submission. Submissions received after this date were also considered.

Input from the public, conservation groups, other interest groups and Government departments was invited both prior to and following the release of the DMP. During the compilation of the draft management plan public input was also sought through:

- a) Visitor Survey
- b) Written Submissions
- c) Workshop
- d) Local Authorities
- e) Schools
- f) Meetings with interest groups
- g) Radio/Press releases
- h) Government Departments

Following its release the draft plan was widely advertised and distributed. There were notices in both the Western Australian and local newspapers, radio announcements and interviews, meetings with Local Authorities, recreation and conservation groups and a general public meeting.

The DMP was distributed to State and Commonwealth Government departments, tertiary institutions, conservation groups, recreation groups and individuals who had expressed an interest in management plans for conservation areas. Plans were also available through the Department of Conservation and Land Management (CALM) metropolitan, regional and district offices. In addition, plans were available for inspection at the Augusta-Margaret River and Busselton Shire Offices and libraries.

This document summarises submissions to the draft management plan for the Leeuwin-Naturaliste National Park. Comments have been detailed according to the part of the draft plan to which they refer. Cross-references to the appropriate part of the restructured final management plan are given in brackets after each heading.



## **PART 2 ANALYSIS OF PUBLIC SUBMISSIONS**

The public submissions to the Leeuwin-Naturaliste draft management plan were reviewed in three stages.

First, the public submissions were summarised to allow analysis. This document provides the summary.

Second, the submissions were analysed using set criteria. Changes were made if the submission:

- A. indicated a change in political commitment, legislation and/or management policies.
- B. provided additional information on biological, physical or social resources which has implications in terms of the capacity of the Park environment to sustain the proposed activities.
- C. provided additional information on affected user groups.
- D. referred to a lack of clarity in the existing recommendations.
- E. indicated that additional recommendations on a particular issue were needed and had not been included in the DMP.

Changes were not made if:

- . there was clear support for the draft proposal.
- . revision was not feasible (generally because the points contradicted existing legislation, government or departmental policy).
- . points made were already in the plan.
- . submissions indicated strongly opposing views, with the existing prescriptions providing the only 'middle ground'.

Third, the draft management plan was reviewed and amended where necessary. Table 1 indicates the degree of revision, provides a summary of changes made and reasons for revision, and refers to the relevant assessment criteria, for the major issues. Numerous other minor editorial changes referred to in the submissions have also been made.

Following consideration and endorsement of the revised plan by the Policy Directorate of CALM and the National Parks and Nature Conservation Authority, (NPNCA) the plan is referred to the local authorities, and then to the Minister for Conservation and Land Management for his signature and gazettal as a final plan.

**TABLE 1 SUMMARY OF MAJOR CHANGES TO THE LEEUWIN-NATURALISTE DRAFT**

<b>ISSUE</b>	<b>RELEVANT SECTION OF DMP AND SPS</b>	<b>RELEVANT SECTION OF FINAL MANAGEMENT PLAN (Recommendation No)</b>	<b>DEGREE OF REVISION</b>
General Structure of Plan	Section A and B		Deletion from Plan
Land Tenure	9.0	3.3 3.13	Modification Addition
	9.1	3.1 3.1.1	Modification Modification
Rehabilitation	11.0	5.1	Addition
Cave Management	12.0	6.0	Modification
		6.2	Modification
		6.4	Modification
		6.8	Modification
Vegetation	13.0	7.0	Additional Text
		7.1,7.2,7.3, 7.4	Addition
Weeds	15.1	9.1 9.1.5	Addition
Dieback	15.2	9.2	Additional Text
		9.2.1	Modification
Fire	15.3	9.3	Addition



MANAGEMENT PLAN		
SUMMARY OF CHANGES	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA
	<ul style="list-style-type: none"> <li>. Clarity of final Plan</li> <li>. Availability of resource material in the draft plan</li> <li>. Final plan is intended for use by Park Managers</li> </ul>	
Rewording	<ul style="list-style-type: none"> <li>. Clarity</li> <li>. More information</li> </ul>	D B
Rewording Rewording	<ul style="list-style-type: none"> <li>. Clarity</li> <li>. Clarity</li> <li>. New Information</li> </ul>	D D B
Spinifex species added to recommendation	<ul style="list-style-type: none"> <li>. Additional Information</li> </ul>	B
Rewording	<ul style="list-style-type: none"> <li>. Clarification of numbers allowed in caves</li> </ul>	B
No Permits required for adventure caves	<ul style="list-style-type: none"> <li>. Cost of implementation, difficulty of regulating</li> </ul>	B
Brides Cave removed as adventure cave	<ul style="list-style-type: none"> <li>. Difficulty of access Safety</li> </ul>	B
Reference to CALM Act	<ul style="list-style-type: none"> <li>. Clarity</li> </ul>	D
New information on rare species	<ul style="list-style-type: none"> <li>. Survey results</li> </ul>	B
Rare species	<ul style="list-style-type: none"> <li>. Specific actions required</li> </ul>	B,E
Proposal for weed management plans	<ul style="list-style-type: none"> <li>. New information</li> </ul>	E
<i>Phytophthora cryptogea</i> in the Park	<ul style="list-style-type: none"> <li>. New information</li> </ul>	E
Reference to CALM Regional Plan	<ul style="list-style-type: none"> <li>. New initiative</li> </ul>	E
Special Fire Management objectives	<ul style="list-style-type: none"> <li>. Clarification of Fire Strategy</li> </ul>	B,D

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN (Recommendation No)	DEGREE OF REVISION
Fire (cont)	15.3	9.3	Addition
		9.3.2	Addition
		9.3.3	Modification
Aboriginal Sites	16.1	10.1 10.1.4	Addition
Access	17.0	11.0	Modification
			Modification
			Modification
			Addition
			Addition
		11.2 Table 4	Modification
			Addition
			Addition
			Modification
		11.2 Table 4	Modification
		11.6	Modification
		12.1.4	Addition
Recreation Sites	18.3	12.0	Deletion



SUMMARY OF CHANGES	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA
Information on Fire Regime	. Clarification	D
Checklist to be approved by District Manager	. Clarification	D
Fuel Loads	. Further research	B
Include Quininup Brook	. New Information	B
Add Pedestrian use to Class 4 tracks	. Clarification	D
Coastal Facilities Site Location	. Clarification	D
Caves Road	. Clarification	D
Beach Access Criteria	. Clarification	D
Upgrading of Class 2 tracks to sealed roads	. Representation from Local Authorities	B
Three Bears track	. Clarification	F
Cape Clairault track Retain	. Representation from Fishermen	B,C
Biljedup Beach Road	. Clarification	B
Bobs Hollow	. Popularity of fishing area	C
Point Road	. Omission in draft plan	E
Salmon Track	. New access to Hamelin Bay	B
Hamelin Bay Road	. Assess limnology of Lake Davies	B,C
Elephant Rock	. Safety	B
Retention of vehicle access to Hamelin Beach and Deepene Beach	. Representation from Fishermen	B,C
Camp fires in designated places	. Camping experience	B
Not required in final plan	. Information is being updated, further research required eg Lake Davies. Site Plan being developed	B

<b>ISSUE</b>	<b>RELEVANT SECTION OF DMP AND SPS</b>	<b>RELEVANT SECTION OF FINAL MANAGEMENT PLAN (Recommendation No)</b>	<b>DEGREE OF REVISION</b>
Recreation Sites (Contd)		12.2.6	Modification
Surfing and Fishing	18.6	12.4	Modification
		12.4.8	Modification
Community Education	19.0	13.0	Modification
		13.2	Modification
Water	20.0	14.0	Addition
			Deletion
Mining	20.2	14.2	Modification
Professional Fishing	20.3	14.3	Modification
Park Administration	22.2	16.2	Modification



SUMMARY OF CHANGES	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA
Include Local Auth. and Advisory Committee in consultation with campsites.	. Clarification	E
Allow resting in vehicles for bona fide fishermen.	. Representation from fishermen	
Liaison with Local Authorities.	. Improved Liaison	E
More information	. Clarification	D
Park Guide to be produced.	. Departmental Policy	A
More information from W.A.W.A.		B
Ellen Brook water supply proposal.	E.P.A. has ruled against the project	A,B
Park is closed to mining.	Government Policy	A
Conditionally retain existing pro fishermen access	Representation from fishermen	B
Establish Advisory Committee.	Departmental Policy	A

## STATISTICAL SUMMARY OF PUBLIC SUBMISSIONS FOR LEEUWIN NATURALISTE DRAFT MANAGEMENT PLAN

### 125 SUBMISSIONS WERE RECEIVED

CALM.....	9
Government Departments.....	14
Local Authorities.....	2
Conservation Groups .....	8
Recreation Groups .....	10
Commercial Interests.....	18
Private Individuals .....	38
Proformas:   Type 1 .....	16
Type 2 .....	5
Ratepayers Associations .....	2
Other.....	3
<b>Total .....</b>	<b>125</b>

### GEOGRAPHIC ORIGIN

Shires of Busselton and Augusta/Margaret	
River .....	75
Metropolitan .....	41
Other Southwest.....	9
<b>Total .....</b>	<b>125</b>



## **PART 3 SUMMARY OF PUBLIC SUBMISSIONS**

### **General Statements regarding the Draft Management Plan**

Generally there was conditional support for the Plan. Most submitters tended to comment on only a few issues. Issues of most concern included Access, Land Tenure, Cave Management, Protection, and Recreation and Tourism.

#### **Support**

- Plan is a good and genuine attempt to balance ecological needs and human demands, the working group is commended for compiling a concise and comprehensible plan
- commend CALM on the presentation of the Plan and the opportunity for public comment
- study has produced knowledge of the most popular sites and the assumption must be that the majority of visitors prefer to see the Park to remain as is. Parks are for people not to be ruined by a few over a short period
- fully supportive of CALM. CALM officers are a dedicated, professional and hardworking group, we hope that the Plan can be implemented virtually in its entirety
- the broad idea of the Plan is commended, when modified and gazetted it will serve as a model for any future coastal national park
- the Plan covers most of the dilemmas that 'people pressure' places on the area. The natural environment must be conserved and this plan is basically acceptable
- the major part of the Plan shows merit, commend CALM on a thoughtful, wellprepared proposal and hope that many of the recommendations will be acted upon in the near future

#### **Conditional Support**

- Regional management and members of the Working Group are beginning to be realistic in reconciling past misunderstandings and injustices
- many points and recommendations have great merit, however, there are avenues for improvement, a major concern is the funding and level of commitment
- agree with majority of the Plan however should retain all existing access, Park is for conservation and recreation
- don't condemn the entire plan however there are points in the Plan that don't satisfy most peoples wishes, suggest that there is more consultation with residents and user groups

#### **Criticism of the Plan**

- the Plan emphasizes recreation, it should emphasize conservation
- recommendations do not adequately recognise recreational opportunities and demands that exist in the Park, more emphasis on providing for the whole community not just four wheel drive owners and bushwalkers.

### **Specific Comments on Sections of the Draft Management Plan**

Discussion is related to section numbers in the Draft Management Plan. The numbering system of the respective section in the Final Management Plan is included in brackets. A summary of comments made in submissions follows.

## **PREFACE**

1 submission refers:

National Parks comprise only 1.8% of the area of W.A., the Leeuwin-Naturaliste National Park must be considered of prime conservation importance and in its present state is a tourist attraction and a unique experience.

## **1.0 INTRODUCTION**

10 submissions refer: There were differing views concerning the General Objective, the problem was one of conservation versus recreation versus other uses. Two submitters thought that the

Regional Context should have more emphasis. The need for the Plan was considered to be mainly due to recreational pressures. The public participation process was well supported.

### **1.1 THE STUDY AREA**

No comments.

### **1.2 GENERAL OBJECTIVES**

- support objectives, a balance must be found to ensure that the public can continue to enjoy the parks as well as ensuring the flora and fauna is protected
- the resources are insufficient to cope with recreational use, education that the Park is a finite and fragile resource is the only way to preserve it
- there is too much emphasis on 'restoration of the natural environment' rather than fulfilling the recreation demands
- this is a naive and simplistic approach which ignores the complex needs of a modern society; management only pertains to the physical management of visitors

### **1.3 REGIONAL CONTEXT**

- uncleared land in the Study Area is not a permanent ecological resource and must not influence management decisions
- the Park should be examined in relation to other Parks to the north and east (it may be necessary to direct future visitors to other Parks) and to the Southwest peninsula region as a whole

### **1.4 NEED FOR THE PLAN**

- the need for the plan is due to the recreation demands which are placing impossible pressures on the natural beauty of this unique area

### **1.5 PREVIOUS STUDIES**

No comments.

### **1.6 PUBLIC PARTICIPATION**

- the Park presents an ideal opportunity to broaden the concept of land management to include participation from neighbouring residents and willing members of the general public.
- suggest that there are incentives for private landowners to keep their properties in a natural state, for example, where the fern *Pteris vittata* occurs at Turner Creek
- do not lose sight of the inability of small conservation-minded groups to battle against private developers

### **1.7- APPROACH TO THE PLAN**

- an adequate assessment has been made

## **2.0 LAND TENURE**

3 submissions refer: all supported the need for consolidation of the Park (by the addition of other reserves, private land etc), there was concern over funding.

- support concept of amalgamating Reserves and bringing them under CALM control.
- complexity is appreciated, problem would not have arisen if funds were available, if necessary, federal funding should be sought
- the need to rationalise boundaries is noted, further areas, including existing Cave Reserves, should be vested in the Local Authority

## **3.0 PHYSICAL ENVIRONMENT**

- An adequate assessment of the physical environment and their implications in regard to management has been made.

### **3.2- GEOLOGY**

3 submissions refer: all critical of the lack of information regarding quality, quantity and value of minerals.

- this section does not fully address the mineral reserves, the geological description is completely inadequate and appropriate management can not be formulated nor implemented on 20 year old data (references were suggested)
- the Park has the potential to host important deposits of base and precious metals
- mining has not been carried out near caves therefore cannot have contributed to the decline in water levels
- the location, quality and quantity of sand at Boranup sand patch was not mentioned (100 million tonnes of lime sand, averaging 80% CaCO<sub>3</sub>)

### **3.3 GEOMORPHOLOGY**

1 submission refers:

- problems associated with erosion are recognised, however, closing tracks is not the only suitable solution

### **3.4 CAVES**

3 submissions refer, two requesting that access to caves was permitted according to the level of skill of the cavers:

- the problems are recognise
- in Recommendation 3.4.1 the emphasis is on 'limited stairs and ramps', it is recommended that caves are graded on the degree of difficulty of access
- caving literature should also include type of equipment required, safety precautions etc.

### **3.5 HYDROLOGY**

4 submissions refer, all to different proponents.

- the Plan clearly identifies implications for management
- it is sensible to use water where it is running to waste
- many surface sources are probably developed, at least to a small degree, as important sources for rural purposes
- the Environmental Protection Authority has recommended that the proposal to supply Gracetown from Ellen Brook is not implemented
- it must be recognised that using alternative proposals outside the Park will often add significantly to the cost

## **4.0 BIOTIC ENVIRONMENT**

### **4.1 VEGETATION**

4 submissions refer: there was concern for the special protection of rare and endangered species and for the general deficit of information on the Park's flora. Additional information was provided in some submissions.

- rare and endangered species need special protection; recreation should not put pressure on their protection
  - the general philosophy of protecting rare flora is sound, however there are some errors.
  - important issues must be addressed with a clear understanding of the deficit of knowledge that presently exists
- 1) further studies must be instigated to supplement those already existing
  - 2) management decisions must allow for the greatest diversity of natural systems to compensate for the gaps in information, therefore management areas require further subdivision
- accumulation of litter increases fuel levels but also acts as a mulch and could be beneficial in dieback control

### **4.2 FAUNA**

3 submissions refer: the same general issues as in Section 4.1 were of concern. Additional information was provided in some submissions.

- the recommendations for fauna management are endorsed; a high priority

should be given to the preservation of fauna habitats and the protection of the remaining mammals

- all invertebrates are recognised as fauna and thus protected within national parks. The region appears to be an important refuge for obligate inhabitants of wet forests and freshwaters. There is an undescribed landhopper in the Park which is apparently endemic to the Ridge.

- Three species of freshwater crayfish, genus *Engaewa* are found only in this region in Western Australia, their distribution should be mapped and their habitat protected.

- the referencing is uneven and incomplete.

#### **4.3 PROTECTION**

3 submissions refer: commenting on weeds, dieback and fire.

**4.3.1 Weeds.** Some weeds are difficult to eradicate, spraying endangers the ecology.

**4.3.2 Dieback.** No access to affected area seems to be the only solution

- the description of disease impact in the area and the predicted impact map is inadequate, affected species should be listed and each outbreak should be mapped, there was no mention of *Phytophthora cryptogea* A2 which has been recorded in the Park

**4.3.3 Fire .** Prescribed burning does not appear to be the answer for forest regeneration

- perimeter and aerial burning traps fauna

- regular control burning is necessary to restrict the dense understorey and thus reduce water intake and protect caves

## **5.0 MARINE ENVIRONMENT**

4 submission refer: The Marine Park concept was supported. Additional information was provided in some submissions.

- the survey of marine areas for inclusion in a Marine Park is a priority

- commercial and amateur fishermen must not be allowed to interfere with the possibility of a Marine Park in the area

- the plan gives no indication of what is meant by Marine Park

- shoreline regions provide nursery areas for several fish species; drift macroalgae are significant in this respect and should not be removed

- the biology of the Salmon should be included (specific information was provided)

## **6.0 CULTURAL ENVIRONMENT**

### **6.1 ABORIGINAL HISTORY**

3 submissions refer: One supported the recommendations, one listed specific sites requiring protection and one provided additional information and references.

- support recommendations

- the complex of 6 Aboriginal sites at Quininup Falls should be mentioned and this area protected

- Additional information was given

- 31 000 years should be 33 000 year BP (Dortch, 1979)

- Chert is not typically considered to be a trade item but is generally used to indirectly date sites in the Southwest; the whole point of the argument is missed in the Plan. Sites containing chert are considered to be at least 5 000-6000 years old

- refer to Dortch (1984) for current information on Devils Lair

- include Shell Middens in the type of sites recorded

- the dates for the Aboriginal Heritage Act are 1972 -1980

- Implication 4: Limestone cave sites have potential for further archaeological investigations. The limestone cave environment offers excellent preservation conditions for archaeological material

- Implication 5: Sites are under threat from increasing tourism and developments



## **6.2 EUROPEAN SETTLEMENT**

4 submissions refer:

- records of European Settlement are of interest but should not interfere with Park management and habitat protection
- Sam Isaacs was the real hero in the rescue attributed to Grace Bussell
- areas of early settlement should be retained for tourism and historic interest
- the management plan needs to consider the history of fishing in the area; many professional fishermen have memorabilia of educative and tourist value

## **6.3 ACCESS**

5 submissions refer: they represented a range of views both for and against closure of tracks and the use of OffRoad vehicles (most comments on access were directed to Section 17)

- confine, define, explain and maintain the access, but please do not preclude
- fragile areas must be protected from erosion caused by off-road vehicles, the closure of many tracks is necessary
- Off-road vehicles should be catered for in designated areas
- Two-Wheel Drives cause most of the damage on tracks suitable for Four-Wheel Drives only, these drivers should be fined for using these tracks
- Recreation usually wins over conservation. Visitors must use only defined pathways; no pathways no entry

## **6.4 TOURISM AND RECREATION**

4 submissions refer: The major concern was regarding use of the Park by commercial operators.

- management problems created by surfing and fishing competitions require cooperation from all groups, costs should not be borne by the Park
- the unknown quantity, underground water, is a constraint to providing facilities
- there should be no commercialism in the Park
- commercial operators could serve as educators. Using an upgraded permit system they should be given special consideration
- the construction of commercial complexes is supported

## **6.5 OTHER LAND USES**

3 submissions refer: All to mining, two were against mining and one was in favour of mining.

- oppose any mining or exploration in national parks
- comments in this section are prejudiced by inadequate data in Section 3.2
- Implication 4: Given that landowners can veto mining on private property it is easier to extract these commodities from Parks
- Implication 5: Information is out of date, since 1982 mineral claims could not be applied for

## **6.6 EXISTING PARK MANAGEMENT**

1 submission refers:

- existing staff levels are inadequate to manage the Park and should be increased as a matter of priority

## **7.0 CONFLICTS, CONSTRAINTS AND OPPORTUNITIES**

2 submissions refer: Both recognised the pressures placed on the Park due to recreation.

- access is an ongoing problem; CALM must recognise its responsibilities
- CALM and private landowners should jointly accommodate people to channel the pressures of public use towards sustainable development for recreation

## 8.0 OBJECTIVES

9 submissions refer: All submissions generally supported the objectives; additional objectives were proposed.

- add to general objectives: promote visitor safety, awareness and appreciation of the natural processes and the scientific and cultural attributes of park resources and the active support for their protection
- add to specific objective establish an integrated visitor information system that targets the range of user groups and utilizes a variety of techniques to get essential messages across
- specific objectives 1, 4 and 12 should be explained further
- suggest that there are active and passive zones which can be interchanged
- regional economic benefits from use of the Park should be acknowledged
- adequate legislation and funding is required to meet these objectives

## 9.0 LAND TENURE (3.0)

26 submissions refer: There were a range of views both for and against the recommendations. There was support for the addition of Crown and other lands to the Park, though concern was expressed regarding resources to fund and manage the land. A number of submissions commented that none of the Park should be vested or leased, others that prior to vesting the lessee's proposals must be detailed. The extension of the Park to Low Water Mark was mostly supported. Many additional areas for inclusion in the Park were proposed.

### GENERAL

- Suggest that there should be a geological appraisal before land is included in a national park

### RECOMMENDATION 9.1

The extension of the Park to Low Water Mark was generally supported and considered a valuable extension of the Park's resources.

Some submitters gave conditional approval provided that: access to fishing opportunities was not constrained; CALM has the required management expertise; horses were permitted to use the beach and amateurs were given access to abalone on the reef platform while professionals (who have the gear and expertise to strip a reef bare) were banned.

Those that opposed the recommendation were concerned it would result in demarcation problems with the Fisheries Department.

### RECOMMENDATION 9.2

**Suggestions:** Park should include Locations 27062, 27063, 27064, 21269, 31367, 31368, 32026, 25685, 413, C24622, 1194, Smiths Beach, Canal Rocks, Winjee Sam Rocks, Meelup Reserve System, Coastal frontage of Yallingup, suitable land vested in the Local Authority, land on north bank of Margaret River opposite Wallcliffe House and the Reserve between Rocky Point and Castle Rock.

### RECOMMENDATION 9.6

Supported.

### RECOMMENDATION 9.7

Supported.

### RECOMMENDATION 9.8

Supported, though there was concern that CALM then has powers to constrain use or charge fees. Not supported- road reserves are the responsibility of the Local Authority, only support inclusion of the Scenic Drive into the Park.

### RECOMMENDATION 9.10

Supported.

### RECOMMENDATION 9.12

- Discussion should also be held with user groups and environmental groups.

### RECOMMENDATIONS 9.1.1-9.1.3

Supported, though concern over aesthetics of facilities and additional pressure on water supply.  
Support for inclusion of Boranup forest in the Park.

## 10.0 MANAGEMENT UNITS (4.0)

4 submissions refer.

- the diversity of management strategies is appreciated however there is too much emphasis on recreation; many species can't survive the people pressure envisaged
- the closure of Deepdene beach to vehicles will allow a wilderness atmosphere to develop and ensure the conservation of Deepdene
- the wilderness areas should be restricted to less than half of the Park and consist of a series of connected islands

## 11.0 LAND MANAGEMENT (5.0)

12 submissions refer: The problems of land management were recognised and the overall approach to rehabilitation and view management were well supported.

- rehabilitation planning is sound
- enquiries from Local Government Agencies would probably avoid the need for trial rehabilitation plots, (for example the City of Perth regarding dune rehabilitation). The fertilizer effects on other species should be studied
- a propagation site is strongly supported
  - in siting, the Plan should consider aesthetics, water supplies and use of local expertise
  - Prevelly is suggested as a site due to local interest
  - use of local species should be encouraged, for example, *Spinifex longifolius* and *S. hirsutus*
  - Agropyron distichum*, would be a valuable addition to the nursery as this species is the most efficient sandbinding plant in the lowest beach zone
- best method of rehabilitation is using Brushwood mats interplanted/seeded with dune pioneers and secondary species
- investigate alternatives to using Marram grass as this species could be ecologically unsound in the future
- the type of dunes and their dynamics should be identified as not all require stabilisation (for example, localized blowouts which develop into steep parabolic dunes or the dune at Cape Clairault)
- the whole of the coastal buffer zone should be managed by one agency (such as CALM) skilled in coastal management
- close liaison should be maintained with the Museum as many of the blowouts are old Aboriginal campsites
- Foot access should not be unlimited

### 11.1 VIEW MANAGEMENT (5.1)

- sensitive landscape architecture should be used in the Park so that 'heavy handed type' developments are avoided. Local Authorities should ensure sensitive siting of private buildings
- what is suggested for the Boranup Sand Patch once sand removal is stopped?
- there should be no reduction in the security of the power supply to the Cape Leeuwin area as this supplies power to the water pumping station

## 12.0 CAVE MANAGEMENT (6.0)

18 submissions refer: There was strong support for most of the recommendations. Members were suggested for the Caves Management Committee. The permit system for caves was a contentious issue; Those opposing permits were generally concerned about the practicality of implementation, other submitters suggested a sliding scale for charging fees.

### Cave Management Committee

- suggest that this includes a member from the W.A. Museum and a Tourist Bureau Guide or a combination of 2 members from CALM and 3 from affiliated groups of the Australian Speleological Federation
- the committee should recommend the number of permits to be issued, and the maximum party size in delicate wild caves
- the concept of the Cave Management Committee (CMC) is supported, however, the current Caves Access committee (CAC) and Working Group on Cave Protection and Management (WGCPM) should continue to exist in their present form. The CAC exercises defacto control of access to locked caves (not all caves), that have been locked for specific reasons. The WGCPM addresses statewide issues, and developed the classification system discussed in the Plan. The proposed CMC should confine its activities to caverelated matters on the Ridge.

### Permit System:

The permit system for cave access was generally supported, there was concern for the costs of implementation. Those opposing the permit system considered it impractical and asked how will permits be policed and issued and how can we determine if applicants are suitable for access to a specific cave. Casual cavers were thought to be the major problem. It was recommended that:

- there is a sliding scale of charges. Commercial tour operators and casual cavers should be on the highest scale (a high fee for casual cavers would encourage these people to use non profit and adventure groups). A permit fee for non-profit and adventure groups should be lower provided their trip frequency is low. Due to their high input to cave management and scientific knowledge speleological societies should be exempt from any charges for permits.
- there are no permits for Giants, Calgardup, Museum, Tunnel and Brides Caves (another submission states that entrance to Brides should be by permit), perhaps a registrar is an alternative
- a fee of \$5 for permits is suitable
- one month application period is not appropriate, many people don't plan in advance
- all caves requiring permits for access should be specified.

### Other issues raised included:

- caves should be graded according to the degree of difficulty of access
- Giants, Calgardup and Brides Caves should be subject to cave management plans
- there should be priority to legislation protecting caves from vandalism
- the cave protection zones should ideally cover the catchment areas of the cave systems
- the water levels in Lake Cave should be monitored.

## 13.0 VEGETATION (7.0)

9 submissions refer: They generally supported the recommendations. Additional information was provided by some submitters.

- six species of gazetted rare flora were identified and specific recommendations for their protection were proposed; A table of declared rare, vulnerable, restricted and poorly known flora was provided (included in final plan)
- there was concern of dieback spreading in flora



- the proposal for CALM to cooperate with neighbouring land owners is commended
- there should be recommendations for management of vegetation units

## **14.0 FAUNA (8.0)**

5 submissions refer: All supported the recommendations.

- the rehabilitation of habitats is of importance
- wetlands have diverse fauna habitats and should be protected
- commend establishment of No Planned Burn areas to protect habitats as fire is perhaps the greatest cause of faunal decline on the ridge
- there should be no spring burning due to the destruction of birds nests

## **15.0 PROTECTION (9.0)**

### **15.1 WEEDS AND EXOTICS (9.1)**

8 submissions refer: Issues of concern were the prevalence, monitoring and control of weeds.

- it is impractical to recommend that Rangers learn to recognise all of the 200 exotic species in the Park or for Rangers or the Agricultural Protection Board to survey the Park
- it is suggested that a series of weed management plans are prepared for the Park (a survey of weeds at Ellen Brook was provided)
- examine the potential use of non-chemical herbicides for example, Garlon, as these are less harmful to insects and other animals (including the staff); Organochlorines, 24D, 245T should not be used. The arum lillies and blackberries at Ellen Brook are of concern
- a section should be included to provide for the protection of privately owned rural properties from declared species

### **15.2 DIEBACK (9.2)**

5 submissions refer: Four submissions supported the recommendations and suggested no access or burning of diseased areas and fines for vehicles leaving designated tracks; There was also a request for further information. One submission considered this section inadequate and that there should be more specific comments using examples from the Park.

- how is spread going to be minimized? (apart from by horses)
- there should be an attempt to assess the disease hazard in the 85% of the Park that is classified 'uninterpretable'

and suggested that

- a detailed inventory of existing dieback sites is prepared
- a hazard rating system is developed, examining criteria such as climate, soil type, geomorphology and susceptible species
- more specific recommendations are made, for example concerning future roads
- researchers are consulted

### **15.3 FIRE (9.3)**

19 submissions refer: Fire was a controversial issue; Some submitters supported the recommendations however, other submitters views ranged from those that believed the proposed fuel reduction burning was insufficient, placing life and property second in priority to the environment, to those that regarded the fire plan as an overkill and to the detriment of the environment. Many submissions commented on the importance of close liaison between the Local Bush Fires Board and CALM, with regular review of all fire protection programs.



## **FIRE MANAGEMENT REGIMES**

### **General**

- look for alternatives to regular burns to ensure the long term survival of fire sensitive species
- there should be no spring burns
- irregular, long rotation summer/autumn burns of high intensity are most appropriate
- it is suggested that around towns, the fire intensity should not exceed 1500 to 2000 kw/m and therefore more frequent burns may be needed

1. Protection Burns (Fuel Reduction Burns). Fuel Reduction Plans were provided for Sugarloaf and Lighthouse areas, Naturaliste to Yallingup, Yallingup townsite, South of Yallingup townsite and west of Woodlands Road, Ellen Brook and Spring Road Area, Prevelly Park townsite and Hamelin Bay Caravan Park.

- Annual fuel reduction programs, particularly along Park boundaries, should be developed in conjunction with Local Fire Control personnel from the Bush Fires Board.
- Annual fuel reduction programs should be tabled for discussion at the Bush Fire Advisory Committee meetings of Busselton (October) and Augusta/Margaret River (September) each year.
- Burning plans should be displayed for public viewing in the two Shire Offices and CALM District Offices.
- Buffer zones should use a range of fuel ages/quantities rather than a single strip burned at a specific fuel load.
- There should be low intensity fuel reduction burns over the entire Park.
- Re-assess fuel levels in these areas in respect to the ecological requirements of that particular area.
- These areas should be smaller.

2. No Planned Burn areas should be extended and include forests. Areas where the forest merges with the coastal heath are of special conservation value.

### **General**

- this section should have a higher priority in the Plan
- control should be vested in an independent body (the Bush Fires Board)
- the fire hazard can be limited by the use of design and planning in the rural community
- heavy machinery should be kept well clear of Cave regions due to the friable and weak nature of the coastal limestone
- all barbecue sites should be designated by Council and all other fires banned
- open fires and barbecues should be completely banned during the high risk summer months
- water sources should be developed for firefighting
- some management tracks should be of a standard suitable for evacuation purposes
- a mechanism is required to determine 'unacceptable fire risk'
- information should be provided on what to do if caught in a fire and how to report a fire
- all burning in the Park should be subject to the provisions of Section 18 and Regulation 15 of the Bush Fires Act, these relate to obtaining permits and permit control
- permits should be used by Fire Control Officers, not from Shire Officers
- when fires escape from private property onto the Park the property owner should pay high penalties

Some submitters requested more information and rationale. They asked a number of questions including; what vegetation types are represented in the three basic fire regimes?; why have No Planned Burn areas?; are they highly sensitive to fire?; what is the scientific basis for Flexible Management Areas?; and what is a wide range of vegetation successions and fauna habitats? The fire history and fire strategy maps were criticised as they were difficult to follow.

## **15.4 FERAL ANIMALS (9.4)**

6 submissions refer:

- include feral pigs in the list of feral animals
- control of feral species by local landowners and CALM should coincide
- seek methods of control non-injurious to native species, (ie. don't use 1080 or strychnine)
- the cost of fencing common boundaries should be shared by CALM and the property owner
- where appropriate fencing may not be required between uncleared land and the Park

## **16.0 ABORIGINAL AND HISTORIC SITES (10.0)**

7 submissions refer: Submitters commented on a number of issues.

- support recommendations; these significant sites require protection.
- The recommendations not only recognise CALM's obligation under the Aboriginal Heritage Act but show a commitment to the value and preservation of the Aboriginal heritage.

### **RECOMMENDATION 16.1.1**

- all staff in the area should receive training in the recognition of Aboriginal Sites
- there should be consultation with the Department of Aboriginal Sites with regard to the proposed visitor interpretation facilities, particularly if access to sites is to be made available

### **RECOMMENDATION 16.2.3**

- add, 'and private landholders'
- Sam Isaacs was the real hero of the rescue by Grace Bussell

### **RECOMMENDATION 16.1.4 AND RECOMMENDATION 16.1.5**

- delete 'where appropriate'

### **RECOMMENDATION 16.1.4**

- add 'Quininup Brook'

## **17.0 ACCESS (11.0)**

40 submissions refer: Access was the most controversial issue in the Plan. The major concern was for the retention of 'traditional' access; Many of the submitters requested access to areas of special interest to them, some submitters wanted preferential access. Comments have been divided into those of a general nature and those specifically dealing with an area/road. Specific proposals frequently mentioned by submitters included the Sugarloaf to Yallingup Road, Deepdene Beach, Cape Freycinet, Cape Clairault, Ellensbrook and Hamelin Bay.

### **GENERAL**

#### **Upgrading Access/Two-Wheel Drive Access**

- roads should be maintained at their present levels and no new roads constructed without an environmental impact assessment
- channel access to reduce damage by upgrading 2WD and 4WD roads/tracks; There should be a strong emphasis on providing 2WD sealed roads; Hire cars are restricted to sealed roads
- All 2WD roads should be managed by the Local Authority as CALM is not a road construction specialist

#### **Off-road Vehicles**

- tracks suitable for 4WD use should be designated for 4WD only as 2WD vehicles degrade these tracks; Offenders in 2WD's should be fined.
- driving off-road vehicles is a recognised activity and should be catered for in designated areas
- challenging 4WD access to the coast would be appreciated

- there should be stricter measures of control for off-road vehicles in the Park; Car rallies and trail bikes should not be permitted in the Park due to the difficulty in ensuring public safety, fauna habitat disturbance and risk of spreading dieback
- direct 4WD's to Flinders Bay, that is, out of the Park

#### **Beach Access**

- beaches should be free from offroad vehicles as the presence of vehicles on or near beaches detracts from the amenity value and there is often littering and campfires near the vehicles
- protect dunes by allowing only one road through them and fencing off other tracks
- one authority should have control over all beaches
- there are not enough beaches accessible to vehicles
- should be more consultation with locals who have knowledge of the changing conditions along the beaches

#### **Parallel roads/Spur roads**

- all parallel coast roads should be opposed
- for professional purposes abalone fishermen prefer transverse roads for quick movement
- access between Caves Road and the coast should be via a series of sealed eastwest roads
- spur roads will provoke amateurs to bypass barriers, cause driver frustration and will also lead to difficulties if fees are to be charged

#### **Preferential/discriminatory access**

- the proposals discriminate against those too young or not agile enough to walk long distances
- Recommendation 17.6, allowing access to Hamelin beach for professional purposes only, is discriminatory; All persons should have the same privileges
- tour operators in 4WD should have access to certain scenic areas as they are familiar with the area and educate the public
- private access is the responsibility of landowners
- CALM should allow access through the Park for landlocked private owners

#### **Enforcement**

- there should be strict enforcement to prevent public use of non-designated areas
- rangers will have difficulties policing closures

#### **Miscellaneous**

- there should be no restrictions to access; the Park will not be appreciated if it is not used
- existing access allows disabled members use of the Park; Examine access for disabled fishermen including for those wheelchair bound
- it is important that tourist bureaus are informed of any road closures
- upgrade the fire management track around Reserve A8429 to 2WD standard; Support policy of getting people out of their cars and onto their feet and all of the recommendations
- support all recommendations

#### **SPECIFIC AREAS (FROM NORTH TO SOUTH)**

##### **SITE/ROAD: Caves Road**

Access proposal in submissions:

- should be upgraded and dedicated a public road under the Local Authority; impose 90 km/hr speed limit

##### **SITE/ROAD: Bunkers Bay**

Access proposal in submissions:

- if the Shire Reserve is vested in CALM the fishermen seek assurances that access is provided to the beach

**SITE/ROAD: Sugarloaf to Yallingup parallel coast road**

Access proposals in submissions: (other comments on parallel coast roads are included in General Comments)

- should be completed to facilitate public use of the Park
  - should not be completed, it would degrade from the scenic beauty that the road seeks to access;
- Spur roads located at short intervals provide sufficient access to the coast and given that visitors are attracted to the unspoilt landscapes

**SITE/ROAD: Three Bears (Kabbejgup) Track**

Access proposals in submissions:

- agree with plan
- upgrade track
- provide access for surfers

**SITE/ROAD: Smiths Beach**

Access proposals in submissions:

- retain access at northern end for professional fishermen
- as this beach is for general 4WD use there will be conflict between professional fishermen and other recreationists (given also that the other 4WD beach is unsuitable)

**SITE/ROAD: Mitchell Rock**

Access proposal in submission:

- upgrade entrance to Mitchell Rock

**SITE/ROAD: Injidup Beach**

Access proposals in submissions:

- retain access at southern end for professional fishermen
- suggest use of lockable gates accessible to professional fishermen; any damage could be claimed from the deposit for the key

**SITE/ROAD: Cape Clairault Track**

Access proposals in submission:

- track should remain open
- track should remain open to the Windows

**SITE/ROAD: Moses Rock Area**

Access proposals in submissions:

- retain access via the firebreak
- provide access via north and south tracks for professional fishermen provide one way access south of Moses Rock to Yallingup
- support recommendations for Juniper and Cullen Roads and Biljidup Brook track and beach
- don't close Biljidup Brook track, close at end of carpark

**SITE/ROAD: Willyabrup to Cowaramup Bay**

Access proposals in submissions:

- retain track as it is
- provide access to north and south Willyabrup tracks for Professional Salmon fishermen- transfer North Point to Council

**SITE/ROAD: Big Rock**

Access proposals in submission:

- agree with plan
- retain access (for surfers)

**SITE/ROAD: Lefthanders**

Access proposal in submission:

- provide access from the carpark to the beach during surfing competitions

**SITE/ROAD: Cowaramup to Ellen Brook**

Access proposal in submission:

- support recommendations

**SITE/ROAD: Ellen Brook**

- (refer to Section 18.3.2).

**SITE/ROAD: Kilcarnup Beach**

Access proposal in submission:

- provide 4WD access to beach, the bay is an important anchorage therefore access to beach is important, it is occasionally fished

**SITE/ROAD: Cape Mentelle**

Access proposals in submissions:

- support closure
- should remain open and be upgraded

**SITE/ROAD: Prevelly**

Access proposal in submission:

- support recommendations

**SITE/ROAD: Boodjidup**

Access proposal in submission:

- close tracks to Marmaduke Point and Boodjidup to vehicles

**SITE/ROAD: Redgate**

Access proposal in submission:

- would like occasional access via southern firebreak

**SITE/ROAD: Bobs Hollow**

Access proposals in submission:

- support plans for Bobs Hollow
- the track should be upgraded to 2WD standard

**SITE/ROAD: Conto's**

Access proposals in submission:

- retain access south of Contos for Professional Salmon fishing
- recommend that Conto's beach is a wilderness beach
- beach is not suitable as a general 4WD beach

**SITE/ROAD: Conto's Field**

- (Refer to Section 18.3.3).

**SITE/ROAD: Point Road**

Access proposal in submission:

- upgrade and widen the road

**SITE/ROAD: Cape Freycinet (South Freycinet Beach)**

Access proposals in submission:

- this beach is not suitable for 4WD recreational pursuits other than angling
- should be a wilderness beach and thus only used by walkers

**SITE/ROAD: Boranup Beach/North Point**

Access proposals in submission:

- support closure of beach
- this is a suitable 4WD beach; It can be accessed via Salmon track or via the track along the southern boundary of 4296; Access should be limited to no access between 8 and 5 in summer

**SITE/ROAD: Grace Road**

Access proposal in submission:

- improve the road and upgrade the carpark



**SITE/ROAD: Hamelin Bay**

- (refer to Section 18.3.1).

**SITE/ROAD: Foul Bay**

Access proposals in submission:

- retain access via a management track (fished occasionally for salmon)
- open Foul Bay lighthouse track

**SITE/ROAD: Elephant Rock**

Access proposals in submission:

- do not upgrade access to 2WD standard as it is not a safe fishing location for the inexperienced public

**SITE/ROAD: Deepdene**

Access proposals in submission:

Disagree with plan

- this beach is a suitable beach for 4WD's. There are limited conflicts of use, vehicles have little effect on the beach due to its mobility
- suggest access along Deepdene Road through locations 75 and 1377, and upgrade and realign track along east of A21451
- there should be access for both professional and amateur fishermen or none at all
- the primary need is for access for amateur fishermen; When nightfishing for large species considerable equipment is used, the best holes are 2.5km southeast of Deepdene Road, there are limited opportunities similar to Deepdene
- retain access for Salmon fishermen via Cosy Corner, this beach is important for Salmon fishing

**SITE/ROAD: Skippy Rock to Cape Leeuwin**

Access proposal in submission:

- support recommendations, is not a tourist beach

## **18.0 RECREATION AND TOURISM (12.0)**

### **18.1 PHILOSOPHY (12.1)**

12 submissions refer: Seven of these commented on rubbish disposal, four for removal and three against removal of bins, various other issues were also considered.

- do not remove rubbish bins
- endorse philosophy particularly the removal of rubbish bins and the provision of gas barbecues, Education of the public to take litter home is supported
- Council requests CALM to dispose of rubbish within the Park
- suggest that short term, portable visitor facilities are used
- demands for activities such as hang-gliding and horseriding need not be met by overuse of the Park; the Park should be unviolable
- suggest that a concept plan for the water wheel is developed
- the main emphasis should be to provide for users of beach and water based activities
- Clubs will not hold briefings and weigh ins in the Park if requested, to avoid congestion by large groups
- develop low key, good quality facilities within reach of local usage, and avoid 'white elephants' to attract tourists
- suggest that waterless composting toilets are used

## **18.2 RECREATION SITES**

One submission refers, supporting Recommendation 18.2.1

### **18.3.1 Hamelin Bay Concept Plan**

#### **Hamelin Bay**

12 submissions refer, most commenting on the replacement of the toilet block and the size and location of the parking area.

##### **a) General**

Proposals/comments in submissions:

- provide access for Salmon fishermen (back of Hamelin cliff is fished for salmon occasionally)
- in addition to new toilet, replace existing toilet (close to the ramp) this area is the calmest and therefore a popular swimming area for children the new turn around eliminates most of the boat-trailer storage
- provide access north of swimming area for 4WD's
- the concept is a step in the right direction however is inadequate to cope with peak demands
- parking area should be larger and located closer to beach
- there is a lack of opportunity to view bay from a vehicle
- professional fishermen should not clean fish in the bay

##### **b) Lake Davies Road**

8 submissions refer, all strongly objected to the proposal.

Proposals/comments in submissions:

- the road should be re-examined and re-designed for complete protection of Lake Davies:

Not a biologically sound decision, the lake is one of seven freshwater lakes on the ridge (four in the Park), all are little known biologically, the lake will be encircled by roads/tracks creating an 'island' effect, the lake is an important fauna habitat, the road is aesthetically unattractive; the lake will be polluted by road runoff etc, the road provides access to greater area of foredune therefore increasing the chances of erosion, the road goes over the old Hamelin Bay townsite which is covered by shifting sands.

- there should be no parking or picnic facilities near the lake
- the lake should not be used for recreational pursuits such as windsurfing
- the rangers pad and aerial are poorly placed and should be relocated

##### **c) Hamelin Bay Road**

6 submissions refer, all criticising the proposal.

Proposals/comments in submission:

- the road will destroy the link between the caravan park and the beach
- there will be conflict between caravan park users and others as the road is too close to the caravan park.
- suggest access via Salmon track
- develop road further north
- provide road and carpark in the middle bay area
- leave the existing road from the Park to the beach
- plan does not alleviate congestion on the beach
- location of entry control point suggests charging fees

##### **d) Caravan Park**

11 submissions refer, both supporting and opposing some of the proposals.

Proposals/comments in submissions:

- the plan denies expansion northwards
- Shorten park east and extend southwards
- distance to new shop is too far

- Park should not cater for expansion of private enterprise as this compromises the Plan's objectives, camping facilities should be provided by private landowners
- support increasing lease and re-routing road
- enforce a strict limit on numbers in the caravan park
- encourage low-key family camping, oppose chalettype development due to erosion problems, water usage, pollution, disturbance to wildlife

### **18.3.2 Ellen Brook Concept Plan**

Proposals/comments in submissions:

Agree with plan

- fully support concept
- support walk trails
- restrict vehicle access onto the beach
- priority to rehabilitation, especially land east of homestead track
- importance of consultation between CALM and the National Trust

Disagree with plan

- carpark intrudes on surroundings, move 100 metres Southwest to the hollow, or move 100 metres further north
- visitor parking should be at T junction with limited management parking near homestead
- information bay should be located away from the homesite with limited signage elsewhere
- CALM while rejecting the WAWA development, will, through the concept plan, encourage an infinite number of people to the area

Other

- suggest the creation of a camping area near to Northern carpark
- suggest restricted access until National Trust plans are finalised, that is, access via pre-arranged tours
- visitor fees could be collected
- suggest that a boardwalk to viewing points at the falls and caves is established

### **18.3.3 Conto's Field Concept Plan**

Proposals/comments in submissions:

- upgrade track between new and old site to 2WD standard
- provide ablution facilities on coast
- allow use of old site during peak period
- plan supported under provision that:
  - development is low key, low impact, and closed when full
  - facilities blend into the environment and local materials are used where possible
  - there is no private enterprise (applies to all of Park)
- more detail is required

### **18.4 CAMPING (12.2)**

15 submissions refer, 6 commented on the need for CALM to comply with health standards, also discussed were commercial development of camping areas and issues relating to specific sites.

- CALM's camping site should meet health requirements with proper sanitary facilities, a water supply, refuse disposal, provision for fire fighting, BBQ's, tables and level ground, it is unfair that CALM can offer sub-standard camping in direct competition with commercial operators
- any commercial development should be subject to Councils development process
- should be no commercial interests in the Park
- encourage the use of campsites away from congested areas in peak periods,
- table 6 should be available for general public information
- there should be more informal bush camping areas

- sites should be numbered, and areas closed once limit is met
  - increase fees to allow for maintenance of sites
  - concern about supervision capabilities of Rangers for additional campsites
  - suggest camping be established at Ellensbrook
  - Point Road camping area requires upgrading and should be expanded towards the coast
  - it will be difficult to enforce the closure of Injidup, the alternative camping site is too close to commercial operations
  - look for alternatives to Conto's
  - open fires should not be permitted in camping areas north of Hamelin Bay, area has not been burnt since 1961
- (refer to Section 18.6 for consideration of overnight camping in vehicles with/without permits)

## **18.5 WALKING (12.3)**

14 submissions refer.

### **General**

- there is too much emphasis on bushwalking given that only 6.2% visit the Park for this purpose, resources could be used elsewhere
- suggest that cross country zones for serious walkers as well as planned trails are provided
- the provision of walk trails should have priority, vehicles have degraded most of the reasonable tracks
- concern that there will be demands to upgrade walk trail to vehicle standard
- as well as Cape to Cape trail develop loop 10-20 km day walks
- need for information duration of walks, viewings etc
- support all trails
- water shortage should have priority over walk trails
- walking trails utilising existing roads, tracks or new walkways should be sited away from caves, the exception being Brides, Golgotha, Giants and Calgardup Caves. No trails should be establish near the Nannup Caves due to the close proximity of other highly sensitive caves

### **Cape to Cape Trail**

- fully support this imaginative concept, it is a tremendous step towards getting people on their feet
- camping areas should be no further than 15km apart with water provided (if not possible, inform walkers)
- utilise firebreaks, tracks and beaches where possible
- study the environmental impacts, give consideration to problems of dieback, erosion, litter, risk of fire and safety
- trail is too difficult for many and over vigorous terrain, is an excuse to close many areas of the Park, and penalises the young and old
- suggest that specific areas are upgraded for all rather than having poor access for a few

## **18.6 SURFING AND FISHING (12.4)**

### **General**

Seven submissions refer.

(the major problems associated with fishing and surfing were related to access (see Section 17.0) and camping (see Section 18.4).

- recommendations for management of events are excellent, support disallowing food vendors



- with adequate, responsible access environmental damage will not occur, recommendations are sound however, how can one assess environmental damage in monetary terms, there should be no off-road vehicles,
- overnight camping by permit is not acceptable
- support that there is three months notice prior to an event
- would like to obtain permits for competitions greater than three months in advance as Club members are notified of venues twelve months in advance
- seeking permits three months in advance inhibits freedom of anglers

### **Fishing**

6 submissions refer, five supported overnight camping in vehicles by permit.

- overnight camping- suggest that club fishermen can camp overnight due to the nature of their activity, (that is, fishing until late at night or in the early hours of the morning), by way of permit with the provision that there are no fires, external structures erected and litter
- there should be restrictions on fish sizes

### **Surfing**

4 submissions refer, specific surfing sites were discussed and the need for regulations governing competitions recognised.

- surfing events should be approved by Council if near townsites and not held in peak periods
- the type and number of competitions should be regulated by policy (and permit)
- no competitions should be held at Lefthanders due to the fragile environment, recommended sites for contests are; Three Bears, Yallingup, Smiths, Injidup, Moses Rock North, Gallows, Guil-lotine, North Point, South Point, Margaret River and Redgate
- the Surfriders Association holds approximately seven contests per year, Lefthanders is the best contest site, given the quality of the break and ability to handle onshore winds (note, that the car-park holds 60 not 25 vehicles and the walking distance is 1400m not 600m). Suggest that alternative access to the beach is established for use by the competition organiser and in an emer-gency
- Big Rock is used for a competition on Labor Day
- would like approval to use Three Bears and Gallows if need arises

## **18.7 OTHER RECREATIONAL ACTIVITIES (12.5)**

Four submissions refer.

- orienteering and rogaining could be accommodated in some areas of the Park
- orienteering and rogaining should be excluded due to the lack of suitable areas
- support Recommendation 18.7.4, require further information for Recommendations 18.7.1, 18.7.2, 18.7.3
- hang gliding should be excluded from the Park due to damage to vegetation and access for acci-dents
- a national windsurfing competition has been held in the Park

## **18.8 ADVENTURE GROUPS AND TOURS (12.6)**

Thirteen submissions refer, three endorsed the recommendations, nine wrote in support of a specific tour operator and one requested preferential access in the Park for tour operators.

- endorse recommendation restricting commercial users
- endorse Recommendations 18.8.1, 18.8.2, further information required for Recommendation 18.8.3
- given the dramatic increase in cave usage for both abseiling and cave activities and the consider-able profit to the organisers, it is recommended that there is an annual fee for commercial operators of approximately \$800, these groups should obtain permits for each trip separately. School groups and nonprofit making groups should only be charged an application fee
- Plan should give guidelines as to the cost of fees, they must be kept to a minimum, fees for the Bungles should not set a precedent



- Five years is the minimum acceptable period for a permit, permits should be transferable if the venture is sold
  - tour operators should have the option of access to all management tracks, on consultation with CALM
  - commercial operators can be made honorary rangers
  - the one day 'offroad' tours of the Park give people the opportunity to see areas they cannot normally visit, and they can enjoy the Park without being especially prepared or extremely fit
- commercial operators in the Park are supported

## **18.9 DOMESTIC ANIMALS (12.7)**

### **Horseriding**

Ten submissions refer, six supported and four opposed horseriding in the Park.

- there should be no horseriding in the Park
- the Plan should make more provision for horseriding in the Park, horseriding allows enjoyment of the Park and is a recreational activity "relying heavily on the quality of the environment"
- environmental impact- there is no evidence of spread of weeds, furthermore native species graze on nearby pasture, (horses can be fed pelletized food therefore weeds are not introduced); riders keep to existing tracks, which reduces the chances of erosion, 4WD's have caused obvious damage, horses have not; foredune need only be crossed when accessing beach using the designated tracks, if erosion is evident they can then be closed; Boranup/Hamelin Bay area is defined as having no dieback impact; there are no alternative horseriding areas without floating horses or riding along road verges.
- the plan states that horseriding is not appropriate yet Recommendation 18.9.1 suggests where it can be undertaken

Submitters supporting horseriding recommended that defined access tracks for horse and rider are designated, specific areas mentioned included Hamelin Bay, Boranup/Hamelin beaches and between Yallingup and Boranup; this should be reviewed annually, rider's should form a group keeping in close contact with CALM; a permit system should be used.

### **Dogs and Cats**

Seven submissions refer, three were against dogs and cats in the Park and four in favour of dog exercise beaches in restricted areas.

- the no dogs and cats regulation should be strictly enforced, dogs can carry hydatids into the area, fauna can die from muscular myopathy two to four days after being chased or from stress two to four weeks after harassment
- should allow dogs, under restraint, to be taken through Park to suitable beaches, that is, where there is no inconvenience to other users

## **19.0 EDUCATION AND RESEARCH (13.0)**

13 submissions refer, all generally supportive of the recommendations. The importance of an education program with informative material was stressed.

### **General**

- all recommendations are supported, developing a good clear education programme is essential in the early stages of implementing the plan, many of the management problems are due to the lack of appreciation of the Park's natural attributes, the environment can be managed and preserved with public support
- publications should be available at all public outlets, in particular, tourist bureau and CALM offices. Liaison with local outlets is encouraged for advice on publications
- brochures should contain information pertinent to geology
- retitle this section Community Education and Interpretation, identify the key interpretation unit
- not sure a visitor information centre is needed, perhaps it would be more suitable to have nodal outlets
- reword the strategy placing more emphasis on the significance of education and interpretation

### **Recommendations**

- 19.2 A Park guide should be produced as a saleable item (Landscape style of production)
- 19.4 Specific pamphlets should be produced for each of the adventure caves featuring a simplistic (but censored) map of the cave and walk/nature trails in the vicinity. Promote the safety aspects and the scientific and habitat values. Include the address of speleological societies
- 19.5 Retain original place names, Prevelly was known as Rifle Butts
- delete this recommendation
- 19.6 Give due consideration to the impact on the environ, aesthetics and frequency of visitation
- 19.7 Reword
- 19.8 Support the provision of walk trails for the disabled, suggest that CALM consults the Southwest Association for Physically Handicapped and the MorrisseyHouse Day Centre for Physically Handicapped, both based in Bunbury
- 19.10 Add after appropriate training and approval by CALM Information Branch
- volunteers could be used in many ways, for example, revegetation, path constructions and walk guides. Proposed education course for CALM staff should also be available for interested volunteers. In addition to the existing groups there are many individuals who would offer assistance. The limitations of community involvement should be understood, their resources are finite and by adding to the many calls on the pockets of local communities may be negative rather than positive
- 19.11 maintain close liaison with the Tourist Industry, where possible utilize existing Tourist Information Centres for dissemination of information
- train tour operators as part of permit approval. Produce a tour operators guide

## **20.0 RESOURCE MANAGEMENT (14.0)**

One submission refers.

- the proposal for 'locking up' materials in the Park does not seem to be in keeping with the future intensive use of the Park by the wider community which services it

### **20.1 WATER (14.1)**

10 submissions refer, there was a range of opinions. Some submissions expressed concern over the decreasing levels of the groundwater and supported all recommendations. One submission wanted no extraction of groundwater within the Park. However, other submissions stated that water resources should be provided for human use. Specific comments were made for each recommendation.

#### **General**

- All recommendations are supported, the excessive use and drawdown on groundwater supplies is a major concern, their replenishment is unknown but the falling levels are known thus it can be regarded as a nonrenewable resource.
- Park users should be educated to carry their own supplies, rainwater catchment tanks should augment Park supplies
- land west of Caves Road is heavily dosed with Superphosphate each year, this apparently filters into cave aquifers. Will this dissolve cave formations? Are the heavy infestations of algae where cave waters reach the surface natural? Is the water quality monitored?
- water resources are essential for community use, every effort should be made to exploit it within reasonable environmental constraints. The plan should emphasize their value to the community
- the Water Authority should be controlling body for water resources

#### **Recommendations**

- 20.1.1 The declaration of the proposed groundwater area would involve detailed studies to develop management strategies and environmental management criteria.
- 20.1.3 The necessity for close liaison between CALM and the Water Authority is recognised.

- Reasonable development and use of water resources within the National Park should be permitted where there is no economically viable alternative source of supply, the development is in the wider public interest and there is no significant adverse environmental impact.
- There should be no extraction of water from any surface or groundwater body within the Park boundary for Water Authority use
- 20.1.4 An extensive program would be required to fully identify the characteristics of the flow system, usually abstraction from the aquifer is required before a reliable estimate of throughflow can be made
- 20.1.7 Some encroachment on the National Park may be required for pipelines, service tanks etc associated with the provision of reticulated water supplies at Yallingup, Gracetown and Prevelly. It will not be possible to identify the areas that might be affected until further investigation of these schemes is carried out. At Augusta, the supply main and service tank associated with the existing supply from Leeuwin Spring are located within the National Park. Action is required to create a water reserve over this land to allow for the protection of these facilities
- 20.1.8 The use of chemicals outside the Park boundary may also have an adverse impact on the environment within the National Park. (Recommendation 15.1.4 also refers). An example of this situation is the Ellen Brook catchment, where arum lilies are present on the catchment outside the National Park. Streamflow caused by heavy rain immediately after spraying of the lilies could adversely affect values in the Park
- 20.1.9 Reduced flow over the waterwheel at Cape Leeuwin is only a problem during summer when the peak demand in the town coincides with the period of minimum spring flow. The Water Authority is willing to investigate and discuss alternative strategies to overcome any problems in this area
- ensuring an adequate and constant water supply to the waterwheel is a priority
- 20.1.10 The EPA has recommended against implementation of the Ellen Brook proposal. The Water Authority is investigating alternative sources for supplying Gracetown (Refer also to comments on Section 3.5)

## **20.2 MINING (14.2)**

16 submissions refer, 10 strongly opposed mining in any National Park, 4 considered that road-building material for use on the local road system should be available and two supported mining exploration and exploitation in the Park. One submitter was concerned that pit areas were to be restricted to less than one hectare.

### **Anti-mining**

- no mining and mining exploration should be allowed in any National Park, any mining is obviously incompatible with National Park values, the value of the minerals are too small to consider intruding on a National Park
- survey of minerals is not required and rehabilitation is not necessary if mining is banned
- consideration should also be given to vegetation units, fauna and aesthetics prior to mining
- quarrying activities should be discouraged, local authorities and other agencies should not be permitted to mine in the Park, surely there are other sources of minerals, what is their mapped distribution and volume in W.A.
- significant deposits of noncave bearing limestone occur elsewhere and are far more viable for mining, if mining is considered by CALM, seismic studies should be conducted to ensure that caves are not at risk
- location 26493 (minerals) should be revested as an A Class Reserve and included in the Park discontinue quarrying of the Boranup sand patch and rehabilitate

### **Pro-mining**

- the Boranup limesand should be excluded from the Park as it is a product not readily available elsewhere
- the Park's gravel resources should be exploited for use on the local road system
- the limestone areas are located on the western side of the Ridge and these should be available for use by Council

- in 1978 five areas with significant amounts of road building materials were identified, A20455, 8434, 20548, 8438 and 32376. The Boranup area is the only significant source of limestone for road subbase. Between Witchcliffe and Augusta, base course material is scarce, the laterite gravel exists in thin surface layers which entails disturbance to a considerable area. Pit areas should not be restricted to less than 1 hectare
- the plan does not appear to recognise the extent of mineral sands deposits, the future interest in exploration and exploitation should be recognised and then assessed at that time
- a properly conducted geological survey (with industry input) should be completed to determine the prospectivity of the Park as the public is entitled to know the total wealth being denied to them. An independent economic impact study should be completed to determine if the land is worth more to the community as a Park than for other purposes

### **20.3 PROFESSIONAL FISHING (14.3)**

Six submissions refer. Four were from bodies representing professional fishermen, they stressed the need for access through the Park to the beaches to their 'traditional' fishing areas. Of the two others, one supported the recommendation and the other proposed further restrictions.

#### **General**

- access by professional fishermen should be limited, clarify the statement "on a preferential basis on certain management tracks"
- licensed and unlicensed off-road vehicles should not be allowed in the Park
- the fishing industry is significant in local employment and income, CALM should allow for and recognise the importance, both historically and economically, of the commercial fishing activities. The continuation of commercial beach fishing activities depends upon the fishermen retaining access through the Park to the beaches from which traditional fishing occurs
- coastal areas within the Park are used by commercial fishermen for access principally to Australian salmon (20% of total WA catch), Australian herring and Roe's and Greenlip abalone (30% of total WA catch). Four Wheel Drives, tractors or trucks are used to transport boats, fishing gear and the catch. The fishing period is predominantly March/April. Herring are fished over a longer period, peaking in April/May, the main fishing areas are Hamelin Bay and close to Augusta
- the Department of Fisheries should remain in control of all fishing grounds
- Recreational fishermen are not confined to specific sites and use predominantly rod angling and trolling methods, their livelihood is not dependent on 4WDs

#### **Salmon**

General information was provided on Salmon and fishing operations

- most accessible beaches are fished for salmon, traditional beaches used are Bunker Bay, Smith's Beach, Injidup, Willyabrup, Boodjidup, Conto's, Hamelin Bay, Foul Bay, Cosy Corner and Deepdene

#### **Abalone**

- Roe's abalone are taken in scattered patches along most of the Leeuwin-Naturaliste down to about Cape Hamelin and including Injidup Beach area, boats are rarely used. The typical method of operation is from the shore, there is no "Proclaimed Fishing Area" for this industry and therefore we use all traditionally used tracks. The exclusion of further areas or restrictions on existing ones is of concern. Greenlip abalone are fished further from shore, south of Hamelin Island using 18-20 foot boats launched from Hamelin Bay and Augusta.

#### **Recommendation 20.3.1**

- support banning vehicles from Injidup beach.
- Injidup is an important Salmon fishing beach, the existing track is orientated to minimise erosion and is a popular walkway. Conflict between users is not a major problem, suggest signs containing information on the fishery to pre-empt potential conflict
- Injidup is one of the few high yield Abalone areas, suggest use of lockable gates, issue keys against a deposit out of which any damage claim could be recouped



### **Recommendation 20.3.2**

- support system of permits.
- permits are unnecessary as the Salmon fishery is a limited entry fishery and the license should be sufficient permit to use approved tracks to access the beach, fishermen should be required to display their license number on their vehicles for identification

### **Recommendation 20.3.3**

- support recommendation.

## **20.4 APIARIES (14.4)**

3 submissions refer. One submitter opposed apiaries in the Park, one requested further information and the other supported apiaries in the Park claiming there is no evidence to suggest that honeybees are detrimental to the environment.

Other comments:

- the Park should not be expected to support commercial industries, these can be carried out on private land. Unsuitable sites should not be relocated. The effect of honeybees on our native flora should be monitored
- the continued use of the Park by beekeepers is fully supported, the Park is utilised by two commercial keepers, ten sites are registered (one keeper has 9 sites)
  - Recommendation 20.4 is not supported as this does not allow for relocation following vegetation losses through wildfire or other factors
  - the relocation of hives near the recreation areas to other areas, is supported
  - it is recommended that; prior to the preparation of a management plan details of the requirements of the beekeeping industry should be obtained: management strategies are not based on unsupported evidence that honeybees present an environmental hazard to flora and fauna; research into honeybees is undertaken by CALM (possibly funded by revenue raised by apiary site rental): CALM liaises with members of the beekeeping industry and the Department of Agriculture

## **20.5 LOGGING, FIREWOOD COLLECTION AND WILDFLOWER PICKING (14.5)**

3 submissions refer, 2 supported the recommendations.

- strong support for recommendation, 'seed gathering' should be included in Recommendation 20.5.1
- once Boranup forest is declared National Park it can no longer be utilized. Boranup forest should be classified Forest Park to allow limited logging and salvage operations

## **21.0 MARINE ENVIRONMENT (15.0)**

6 submissions refer, generally all supported the recommendations. (Recommendation 21.3 referring to the extension of the Park to Low Water Mark was discussed in recommendation 9.1)

- all recommendations are supported, the inclusion of marine areas into the Park would add another dimension to the overall vitality of the Park, this proposal needs urgent action, with the increasing pressure on inshore reefs from the expanding recreational fishing sector, protection of these areas is a priority, especially the protected bays which are prone to overfishing.
- the various impacts of commercial fishing, amateur fishing, speed boat recreation etc and associated activities on land would need to be studied before zoning multiple use in the Marine Park
- agree in principle, consider local input, use Ningaloo Marine Park as a model, areas should be set aside specifically for recreational divers, the proposal be the subject of a management plan
- areas such as Yallingup reef should be included in the Marine Park, the degradation of this reef is of concern, in particular the degradation of the abalone habitats
- this section could be redrafted to forewarn of the eventual declaration of a marine park



## **22.0 PARK ADMINISTRATION (16.0)**

### **22.1 STAFFING (16.1)**

8 submissions refer, the majority of the submissions commented on the need for more staff to ensure effective management of the Park.

- the Park is going to require more staffing to effectively manage people, with the proposed changes management of the Park will be more difficult for Park Rangers
- staffing is one of the major shortcomings of existing management of CALM lands, staff levels must be increased and suitable training carried out
- projected staffing levels will not cope with the plan's initiatives, the Park is already suffering from a lack of managing resources.
- the extent and diversity of the Park warrants an increase in Park rangers, the Park cannot be protected without adequate specialised staff having the authority and the backing of legislation to support the Plan. Additional funding is obviously imperative
- Park staff should be given the powers to make arbitrary decisions to close off any area in the Park which is obviously overused

### **22.2 VOLUNTARY GROUPS (16.2)**

6 submissions refer, many requested representation on the Park Management Committee.

- request that the Park Management Committee includes a representative from the Western Australian Recreational and Sportfishing Council and from an Amateur Angling Club
- it must be remembered that the Park is not utilised only by the local community

### **22.3 SAFETY (16.3)**

One submission refers, submitter supported most recommendations.

- support Recommendations 22.3.1, 22.3.2, 22.3.4, 22.3.5, 22.3.7, existing levels of ranger patrols (and personnel) should be increased (Recommendation 22.3.6)

### **22.4 PARK MANAGEMENT FACILITIES (16.4)**

Four submissions refer.

- support recommendations 22.4.2, 22.4.3, further information is required in Recommendations 22.4.1, 22.4.4, 22.4.5
- the report does not recognise the continual increase in the number of people using the Park which has become an impost which locals must bear, local facilities are being parasitised with no tangible return to local benefit
- powerlines should be diverted around the Park or underground, the use of solar power for park facilities is a good alternative
- Recommendation 22.4.5 CALM should consult the Cave Management Committee during the process of site selection for the Rangers House in Block 8434

## **23.0 ASSOCIATED LAND USES (17.0)**

6 submissions refer, there was both support and opposition to the recommendations, the principles of joint management were questioned as was the acquisition of additional land for inclusion in the Park.

- strong support for all recommendations, cooperation between land owners is most important
- where adjacent land has an impact on the Park, reversion or acquisition of the land to ensure the status of the Park is maintained is preferable to attempting to share control with a private landowner
- CALM should have power to veto proposals which may have a detrimental effect on the Park
- the existence of National Park adjacent to private property should not exclude the landowner from being involved in a Special Rural Subdivision
- the emphasis is given to joint management however this has not been demonstrated

- the ceding of land for Park purposes as part of the development process is not advocated unless it is essential for Park consolidation and management. With its limited resources and funding CALM's management capability is doubtful
- the Plan emphasises that developments outside the Park should be referred to CALM, conversely, developments within the Park should be referred to Council and others

## **24.0 RESEARCH AND MONITORING (18.0)**

5 submissions refer, most of the comments on Research were directed to the specific sections of the Plan.

- all recommendations are supported
- more funding on research is required to identify the flora and fauna of the Park, to determine management problems and provide their solutions and to determine how to deal effectively with degradation of the Park environs

## **25.0 PRIORITIES (19.0)**

1 submission refers: The difficulties are appreciated but could be minimised by additional funding

## **26.0 FUNDING (20.0)**

9 submissions refer, there was considerable criticism of this section of the Plan. Funding was regarded as a crucial component of the Plan and more details were requested. Possible sources of funding were proposed.

- State Government funding should be increased to raise our Parks to international standards and to protect their ecology. The Government should be the main source of funding, its responsibility for protecting the environment should not be taken lightly. We urge the government to make available the necessary funds to fully implement the Plan
- the plan is flawed as it bears no relationship to funding, it is not appropriate to publish a plan for public comment when the public has no idea of the manner in which the plan will be funded and implemented.
  - Council is not confident in CALM's capability for implementation given the current and future staff and funding levels
  - there has been no Works Programme and Budget prepared for the duration of the Plan (as for the Shannon Park and D'Entrecasteaux National Park), until this is formulated no comment can be given as to whether the costings are realistic
  - no one should have to accept a Plan which obviously involves considerable additional expenditure if it means the issue of a "blank cheque" to fund it
  - CALM is managing the major tourist attraction of the South-west, fees for entering the Park would raise money, protests and more interest in the Park
  - there should be no entry charge as funding is from State taxes
  - additional funds could be obtained from camping charges, sale of maps and plans, also suggest tourist complexes at lookouts with restaurants and shops
  - sponsorship (without strings attached) would be a valuable additional source of funding
  - a possible source of funding for all Parks and Reserves is a percentage of the sports instant lottery system
  - commercial operators should pay a permit fee
  - charging for permits to enter caves would be expensive to implement and maintain and would eventually lead to much animosity
  - oppose new leases however present leases should be renegotiated to give public a better return
  - no commercial sponsorship (and advertising) or leasing, joint development or adventure tours should be considered.
  - while funding has been provided to establish walk trails the future cost of their maintenance is of concern