Marmion Marine Park

Analysis of Public Submissions

MANAGEMENT PLAN No 23

Department of Conservation and Land Management

National Parks and Nature Conservation Authority

MARMION MARINE PARK

ANALYSIS OF PUBLIC SUBMISSIONS

TO THE DRAFT MANAGEMENT PLAN

1992

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INTRODUCTION

This document analyses submissions to the draft management plan (DMP) for Marmion Marine Park. Comments have been detailed to the section of the DMP to which they refer.

The Marmion Marine Park DMP was released for public comment on 3 October 1990 by the Hon. Minister for the Environment, Mr R. J. Pearce MLA. The plan was available for comment for a period of two months to 7 December 1990. All submissions have been summarised and changes have been made to the plan where appropriate.

During the compilation of the DMP, input was invited from the public, conservation and recreation groups, organisations and Government departments. The Marmion Marine Park Consultative Committee was established to represent the two relevant local authorities as well as the State Government management agencies involved. This Committee played a major role in the formulation of the DMP.

The DMP was distributed to State Government departments, tertiary institutions, conservation groups, recreation groups, local authorities, libraries and numerous individuals. Copies of the plan were available for perusal at several libraries and available for purchase from CALM's State Operations Headquarters, Crawley Office and Marmion Marine Park Office at Hillarys Boat Harbour.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the DMP was available for comment.

ANALYSIS OF PUBLIC SUBMISSIONS

Methods of Analysis

The public submissions to the Marmion Marine Park draft management plan were reviewed in three stages:

- Public submissions were summarised to allow analysis (this document);
- The submissions were assessed using the criteria below;
  1. Changes *were* made to the DMP if the submissions:
     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 committment, or management policy;
     d) proposed strategies that would better achieve management goals and objectives; or
     e) indicated omissions, inaccuracies or a lack of clarity.

  2. Changes were *not* made to the DMP if the submissions:
     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 prescription providing a preferred management option; or
     f) contributed options which were not feasible (generally due to conflict with existing legislation, Government or department policy).

- The DMP was reviewed and amended where necessary. Numerous minor editorial changes referred to in the submissions have also been made.

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

Number and Origin of Submissions

All submissions received were 'substantial' submissions, i.e. no petitions or proformas were received. The number and place of origin of submissions are listed below.

	Number	Percent
CALM	3	14
Community Organisation	4	18
Government (Local)	2	9
Government (State)	8	36
Individuals	5	23
	22	100

A list of submittors to the Marmion Marine Park draft management plan is given in Appendix 1.

Analysis Table

The Analysis Table contains:

- The number of different comments made about each section of the draft plan;
- The number of submissions received on each comment;
- A summary of each comment made on the draft 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;
- An indication whether or not the comment resulted in an amendment to the draft plan; and
- The criteria by which each comment was assessed.

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
	General Comments				
	6 submissions				
1	The Marmion Marine Park draft management plan shows an excellent balance between conservation issues and the Park's importance as a recreational resource.	1	No	Support for plan.	2(a)
2	The team that compiled the draft management plan is to be congratulated for a very fine performance.	1	No	Support for plan.	2(a)
3	The City of Stirling supports the plan.	1	No	Support for plan.	2(a)
4	The draft management plan seems to have bowed to pressure from the fishing lobby.	1	No	Refer to 18.0 Principal Recreation and Commercial Directions.	2(d)
5	The cover photo should have a caption.	1	No	Not considered necessary.	2(c)
6	Recycled paper should be used.	1	No	Recycled paper will be used in the final plan.	2(d)
7	Your Department is to be congratulated on the quality of this detailed and much needed draft.	1	No	Support for plan.	2(a)
	PART A. BACKGROUND				
	1.0 INTRODUCTION				
	1.1 Principles of Management				
	1 submission.				
1	Support for main goals of the management plan, especially the promotion of information, guidance and interpretation programs.	1	No	Support for plan.	2(a)
	2.0 HISTORY OF THE MARINE PARK				
	2 submissions.				
1	Should include the purchase of the Whitfords nodes area (adjacent to the Park) by State and local authorities. Council is seeking reclassification of this area as 'A' Class reserve.	1	Yes, p.21	The addition of natural areas close to the Marine Park to the CALM estate is being investigated. Refer to 10.0 Adjacent Land Management.	1(a,e)
2	The Park was gazetted on 13 March 1987 and not 13 May 1987 as stated on page 10.	1	Yes, p.9	Amend plan accordingly.	1(e)
3	Should state the gazetted purpose of the Marine Park, ie. 'conservation of aquatic and terrestrial flora and fauna generally and their habitats, and for public recreation'.	1	Yes, p.13	This information was cited in the draft plan and will be given greater emphasis in a new section, 6.0 Purpose and Tenure.	1(e)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
	2.1 Boundaries *2 submissions.*				
1	Park boundaries should be altered to include those areas of Hillarys Boat Harbour and Ocean Reef Boat Harbour on the outer walls, below the high water mark. This would provide a definable point at which CALM's responsibilities end, and those of Marine and Harbours begin.	1	Yes, p.19	Management responsibility will be defined in an Interagency Agreement.	1(d)
2	The reserve numbers for Little Island and Burns Rocks are incorrect and should read 39872 and 39873 respectively. The numbers given are location numbers.	1	Yes, p.13	Amend plan accordingly.	1(e)
3	The Little Island and Burns Rocks reserves have been proclaimed Class 'A' reserves in the gazette of 9 November 1990.	1	Yes, p.13	Both reserves are included in the Marine Park under the Land Act. This has been clarified in a new section on purpose and tenure.	1(e)
	3.0 NATURAL ENVIRONMENT *1 submission.*				
1	More documentation as to the sources of scientific data may be useful.	1	No	The plan is a management tool rather than a technical document.	2(d)
	3.1 Geology *No submissions.*				
	3.2 Geomorphology *No submissions.*				
	3.3 Hydrology *No submissions.*				
	3.4 Climate and Oceanography *No submissions.*				
	3.5 Coastal Processes *No submissions.*				
	3.6 Marine Biota **3.6.1 Benthic Communities** *1 submission.*				
1	Replace "Posidonia sinuosa" with "Posidonia coriacea".	1	Yes, p.31	Three species are present in the Park. They will be referred to as Posidonia spp.	1(a,e)
	3.6.2 Fish *1 submission.*				
1	Amend Table 1 to read "Westralian jewfish" instead of "Australian jewfish".	1	Yes, p.32	Amend plan accordingly.	1(e)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
	4.0 LEGISLATIVE AND ADMINISTRATIVE ARRANGEMENTS **4.1 Acts of Parliament** *No submissions.* **4.2 Management Responsibilities** *No submissions.* **4.3 International Treaties** *No submissions.* **5.0 MARINE PARK VALUES** **5.1 Conservation Values** *No submissions.* **5.2 Recreational Values.** *No submissions.* **5.3 Historical Values** *1 submission.*				
1	Statement re. City of Stirling says nothing.	1	Yes, p.21	More specific information will be provided in a new section, 10.0 Adjacent Land Management.	1(e)
	5.4 Educational Values *No submissions.* **5.5 Commercial Values** *No submissions.* **5.6 Scientific Values** *2 submissions.*				
1	Stress the importance of future research in understanding the ecosystems of the Park.	1	No	This is recognised in Section 26.0 Research and Monitoring.	2(d)
2	The term 'better understood' appears too broad a generalisation leaving a false impression of considerable research in the Park.	1	Yes, p.6	Reword accordingly.	1(e)
	6.0 MARINE PARK CONSTRAINTS *1 submission.*				
1	Any failure by management authorities to effectively communicate could also be viewed as a management constraint.	1	No	Liaison is established through the Consultative Committee and via other means.	2(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
	6.1 Conservation Constraints *No submissions.*				
	6.2 Recreational Constraints *No submissions.*				
	6.3 Historical Constraints *No submissions.*				
	6.4 Educational Constraints *No submissions.*				
	6.5 Commercial Constraints *No submissions.*				
	PART B. MANAGEMENT STRATEGIES				
	7.0 MANAGEMENT GOALS AND OBJECTIVES *2 submissions.*				
1	Support for aims and objectives.	2	No	Support for plan.	2(a)
	8.0 MANAGEMENT ZONING **General Discussion** Due to public submissions regarding zoning, particularly the location and extent of sanctuary zones, the zoning scheme will be reviewed early in the life of the plan (see 8.0 Zoning). Public comment will be sought via the review process allowing all interested people/groups to have an input into the proposed scheme (see 32.0 Review).				
	8.1 Zoning Framework *3 submissions.*				
1	Support the zoning section.	1	No	Support for plan.	2(a)
2	The zoning scheme in the draft management plan is an inadequate basis for the management of the Marine Park's biological resources.	1	Yes, p.18	One sanctuary zone has been added. Refer also to the General Discussion.	1(d)
3	The current zoning regime is unbalanced in favour of the commercial users and not an accurate reflection of the existing useage from recreational users. If the zoning scheme is to successfully reduce conflict between users, this basic inequity needs to be addressed.	1	Yes, p.15	Recreation use has priority in the majority of the Park over commercial use. Refer also to the General Discussion.	1(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
4	Differences between General Use and Recreation Zones needs to be made clearer.	1	No	Commercial use is permitted in the General Use zone and not in the Recreation zone.	2(d)
	8.2 Application of Zones **8.2.1 Sanctuary Zones** *5 submissions.*				
1	Sanctuary zones should include a sample of all major habitats including seagrass beds and outer reefs.	2	Yes, p.18	Outer reef and seagrass beds have been included in sanctuary zones. Refer also to the General Discussion.	1(d)
2	The sanctuary zones have been greatly reduced in size from the areas recommended by the EPA in 1985.	2	Yes, p.18	One sanctuary zone has been added. Refer also to the General Discussion.	1(d)
3	Recreational fishing should be allowed in sanctuary zones.	2	No	Some areas are to remain free from fishing.	2(d)
4	Sanctuary zones are too small to make much difference to the replenishment of fish stocks.	1	Yes, p.18	One sanctuary zone has been added. Fish stocks are managed on a sustainable basis throughout the Marine Park.	1(d)
5	The draft management plan provides equivalent level of protection (sanctuary zones) for only 3 of the 6 communities identified by EPA, 1985.	1	Yes, p.18	Greater protection has been afforded by the addition of one sanctuary zone. Refer also to the General Discussion.	1(d)
6	An enlargement of the Little Island Sanctuary Zone to include a sample of the deep water outer reef habitat would be one way of representing all the habitat types within sanctuary zones.	1	Yes, p.18	This has been undertaken. The location of boundaries are subject to detailed survey.	1(d)
7	There are clear ecological grounds for including a sanctuary zone in the outer reefs area.	1	Yes, p.18	See Comment 1, this section.	1(d)
8	Burns Rocks appear to have the same status as Little Island according to Appendix 3.	1	No	Appendix 3 refers to their reservation as Marine Park under the Land Act and not their zoning.	2(d)
	8.2.2 Recreation Zones *2 submissions.*				
1	Recreation zones are considerably less than the areas proposed in 1985. This gives a pitifully small proportion of the Park protection to preserve the values of a Marine Park and to act as replenishment areas for the remainder.	1	Yes, p.18	Recreation receives highest priority in most of the General Use zone. Recreation zones in the 1985 document differ in the types of uses permitted. Refer also to the General Discussion.	1(d)
2	A far greater area of near-shore reefs should be included in the recreation zone in order to restore a more equitable zoning scheme, as recommended by the M10 Marine Park study team in 1985.	1	Yes, p.18	See Comment 1, this section.	1(d)
3	Line fishing should not be permitted in recreation zones.	1	No	Fishing is considered a legitimate recreation activity. It is not permitted in the Sanctuary Zones.	2(d,f)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN IN REVISED MANAGEMENT PLAN	CRITERIA
4	"Observation Zone" is preferred to "Recreation Zone".	1	No	Terminology is based on accepted Statewide marine park zoning.	2(f)
5	Extend the Waterman Observation Zone to either the outside of Centaur Reef or the western boundary of the Park.	1	Yes, p.18	This will be considered when the zoning scheme is reviewed early in the life of the plan. Refer to General Discussion.	1(d)
6	The Boyinaboat Observation Zone should become a sanctuary zone separated from the general use zone surrounding Hillarys Boat Harbour, i.e. fishing be allowed from the sea wall but not at the reef.	1	Yes, p.18	Plan has been amended accordingly.	1(d)
7	All sanctuary zones could be called observation zones.	1	No	Terminology is based on accepted Statewide marine park zoning.	2(f)
	8.2.3 General Use Zone *1 submission.*				
1	General use zone should allow spearfishing.	1	No	Spearfishing is allowed within the part of the General Use zone 1800m from shore, with the exception of any Sanctuary zones.	2(d,f)
	Other (refers to Table 1 and Map 2.) *4 submissions.*				
1	Spearfishing exclusion zone should be extended to include a large portion of Marmion Reef.	1	No	See Comment 1 and General Discussion. Sanctuary zoning is likely to be extended in the future. Spearfishing is excluded from these areas.	2(f)
2	A more practical way of designating spearfishing area is to permit spear-fishing only on the offshore reefs, i.e. Marmion Reef, Three Mile Reef and their outliers.	1	No	The spearfishing area will be illustrated on maps.	2(f)
3	Spearfishing on scuba should be corrected to "on compressed air" as it implies spearfishing on Hookah or other apparatus is permitted.	1	Yes, p.16	Amend accordingly.	1(d,e)
4	Change 'Rock Lobster Potting' to 'Rock Lobster Fishing'.	1	Yes, p.16	Amend accordingly.	1(d,e)
	9.0 OFFSHORE DEVELOPMENT **9.1 Navigation and Other Markers** *3 submissions.*				
1	Support the recommendation.	3	No	Support for plan.	2(a)
	9.2 Moorings *3 submissions.*				
1	Support the recommendation.	2	No	Support for plan.	2(a)
2	A number of permanent mooring points should be established throughout the Park to reduce damage to seagrass beds by indiscriminate anchoring.	1	No	This is not precluded. If needed, the best management option is to exclude anchoring from specified areas if necessary.	2(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
3	No anchoring or boat traffic should be permitted between Boyinaboat Reef and the southern breakwater of Hillarys Boat Harbour to minimise safety hazards to divers.	1	Yes, p.41	Boating restrictions will be considered in high use diving areas. Boating will be prohibited at this particular site.	1(b)
	9.3 Jetties *2 submissions.*				
1	Support the recommendation.	2	No	Support for plan.	2(a)
	9.4 Groynes and Breakwaters *2 submissions.*				
1	Support the recommendation.	2	No	Support for plan.	2(a)
2	Recommend adding "... and the Environmental Protection Authority" to the recommendation.	1	Yes, p.49	Amend action accordingly. Environmental impact assessment is required in accordance with the EPA Act (1986).	1(c)
	9.5 Structures and Platforms *3 submissions.*				
1	Support the recommendations.	1	No	Support for plan.	2(a)
2	CALM should identify its requirements for structures and platforms in advance. Project proponents would then know if their proposals were feasible.	1	No	Proposed projects are considered on a case-by-case basis by the EPA in consultation with CALM.	2(d)
3	Support M10 proposals : A scuba diver gearing-up platform be built on the southern breakwater of Hillarys Boat Harbour, immediately opposite the Boyinaboat Reef. This platform should have access steps from breakwater pedestrian walkway to the platform, and from the platform to mean low water level.	1	Yes, p.40	CALM, in consultation with Marine and Harbours, will investigate methods of improving diver access especially for Boyinaboat Reef (Refer to 19.3 Diving and Snorkelling).	1(b)
	10.0 ONSHORE DEVELOPMENT *1 submission.*				
1	The management of land west of West Coast Hwy needs further consideration.	1	Yes, p.21	Addition of lands to the Marine Park will be investigated. A new section 10.0 Adjacent Land Management has been included in the plan.	1(a)
2	Land holdings acquired by SPC should be included in the Marine Park, in view of the prospective agreement about such lands proposed by the Regional Parks Taskforce.	1	Yes, p.21	See Comment 1, this section.	1(a)
3	Crown reserves between SPC land and the water should be amalgamated with the Park.	1	Yes, p.21	See Comment 1, this section.	1(a)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
4	Should amend plan to reflect intention to transfer the SPC landholding to CALM, however, it is realised that a major alteration may not be appropriate at this time.	1	Yes, p.21	See Comment 1, this section.	1(a)
	10.1 Marinas				
	5 submissions.				
1	There should be no more development of new/existing marinas in the Park.	3	No	New marinas will be discouraged. Any proposal will be subject to assessment according to EPA Act (1986) in consultation with CALM.	2(f)
2	Support the recommendations.	2	No	Support for plan.	2(a)
3	CALM should identify its requirements for marinas in advance.	1	No	CALM is not involved in the management of marinas.	2(c)
	10.2 Boat Ramps				
	2 submissions.				
1	Support the recommendations.	2	No	Support for plan.	2(a)
	10.3 Drainage and Discharge				
	5 submissions.				
1	Concerned at proposal to duplicate the discharge of secondary treated sewerage from the Beenyup Waste Water Treatment Plant.	2	No	This proposal was accepted by EPA subject to conditions including a monitoring program.	2(f)
2	Sewerage outlets should be located as far as possible from the Marine Park.	1	No	See Comment 1, this section.	2(f)
3	Water quality in Hillarys Boat Harbour should be monitored, any source of nutrient discharge should be stopped, and the water quality improved.	1	Yes, p.50	Information added for clarity. Monitoring already occurs.	1(e)
4	Alternative waste disposal methods should be actively considered.	1	No	Beyond scope of plan.	2(c)
5	Support Recommendation 2 endorsing EPA recommendations.	1	No	Support for plan.	2(a)
6	If the treatment is upgraded enough to halve the nutrient loading, it should be pumped inland to where it would be of benefit to agriculture.	1	No	Beyond scope of plan.	2(c)
7	Incomplete research on effect of effluent discharge should preclude any move to construct a second pipeline.	1	No	See Comment 1, this section.	2(f)
8	Liaison should be maintained between CALM and City of Wanneroo in respect of the location of sumps on stormwater outfalls. These may be located in or near foreshore reserves which may in turn affect the Park.	1	Yes, p.50	Add action.	1(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
	11.0 RECREATION ACTIVITIES *1 submission.*				
1	More detail is required with regard to the implementation of these recommendations. Will they affect or include co-operation from the City of Wanneroo and its management responsibilities ?	1	No	The City of Wanneroo and CALM liaise formally through the Consultative Committee and Coastal Recreation Advisory Committee and informally as issues arise. Co-operation between both and a good working relationship are essential.	2(d)
	11.1 Fishing *8 submissions.*				
1	All competition fishing should be prohibited in the Park.	2	Yes, p.43	A new section on competitive events is included in the final plan, permits are required and stringent conditions established.	1(d)
2	Recreational fishing should be allowed in sanctuary zones.	2	No	Contradicts definition of sanctuary zone which prohibits exploitation.	2(f)
3	The public needs to be advised regarding Park fishing regulations and methods through on-site signage. This is especially important where Park regulations differ from those under the Fisheries Act.	1	No	This is already being undertaken and will be improved.	2(d)
4	Support prohibition of fishing at the Lumps Sanctuary Zone.	1	No	Support for plan.	2(a)
5	Fishing should not be permitted in recreation (observation) zones.	1	No	Fishing is not permitted in sanctuary zones which are observation areas.	2(d)
6	All angling clubs should be excluded from obtaining permits for competition in the Park.	1	No	All competitive events require CALM's approval.	2(f)
7	Give consideration to an annual permit for affected angling clubs on submission of a list of their yearly events.	1	No	Specific detail on permit system will be considered during implementation of the plan.	2(d)
8	Will those permits attract a fee similar to national park camping permits, or any fee at all ?	1	No	This is subject to Departmental policy. This detail is too specific for a management plan with a ten year term.	2(c)
9	Opposed to proposal to ban spearfishing using compressed air but continue to allow other types of fishing.	1	No	Spearfishing not using compressed air is allowed 1800m from shore. Restrictions are needed due to the impacts of this activity on the natural resource and other users.	2(d)
10	Suggest consideration be given to :	1			
	(a) ban all fishing on alternate days;		No	Not considered practical for management.	2(f)
	(b) ban all fishing in certain selected areas;		No	This is already being undertaken. Refer to Sanctuary Zones.	2(d)
	(c) ban all fishing all together; or		No	Fishing is a sustainable activity; some areas are free of fishing.	2(e)
	(d) impose bag limits.		No	This is already provided for.	2(d)
11	Should amend Recommendation 6 to state that a flight of ganged hooks (eg. a mulie rig) counts as one hook.	1	Yes, p.39	Amend action accordingly.	1(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
12	Should have areas set aside for young divers to learn underwater fishing.	1	No	Diving is permitted throughout the Park for observation. Spearfishing by free-diving is allowed 1800m from shore for all ages. Spearfishing using compressed air is not permitted.	2(d)
13	To close the area completely to divers will lead to further pressure on areas outside the Park.	1	No	See Comment 12, this section.	2(d)
14	Fisheries, CALM and Australian Underwater Federation should get together to work out fish sizes for those predominantly caught by divers close to the shore (these aren't the same species as caught by line fishermen).	1	No	See Comment 12, this section.	2(d)
15	Exotic and inedible fish should not be caught.	1	No	See Comment 12, this section.	2(b,d)
16	Areas could be marked exclusively for underwater fishing and could be easily policed.	1	No	See Comment 12, this section.	2(d)
	11.2 Collecting **11.2.1 Abalone** *2 submissions.*				
1	Need to define "Abalone harvesting" in Recommendation 1.	1	No	Harvesting means taken for consumption.	2(d)
2	Add "reef impact" to Recommendation 2.	1	No	Covered in Recommendation 3 (now Action 2, 19.2 Collecting).	2(d)
3	Should be a permanent ban on recreational abalone fishing.	1	No	This fishery is regulated by Fisheries Department in liaison with CALM. The need for restrictions is determined on an annual basis.	2(d)
	11.2.2 Live Specimens *No submissions.*				
	11.3 Diving *2 submissions.*				
1	CALM should develop programs for conducted dive tours, nature swims and walk trails in conjunction with an operator with a view to development of the tours on a commercial basis.	1	No	CALM does conduct programs. All proposals for commercial tours are assessed on a case-by-case basis and are subject to permit. Refer to 21.0 Commercial Operations.	2(d)
2	Support the establishment of snorkel and scuba trails.	1	No	Support for plan.	2(a)
3	Should emphasise the importance of access and safety for divers.	1	Yes, p.40	A new action on safety has been included.	1(d)
	11.4 Boating *2 submissions.*				
1	Current information is completely inadequate for boat users.	1	No	Boating information is provided by Dept of Marine and Harbours. CALM will liaise with this Department on this issue.	2(c)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
2	Support Recommendation 2.	1	No	Support for plan.	2(a)
3	Recommend that boat restrictions are enforced in waterway between Boyinaboat Reef and southern wall of Hillarys Boat Harbour.	1	Yes, p.41	Boating restrictions will be enforced in this area.	1(d)
4	Provision should be made for use of the Park waters by the Whitfords Bay Sailing Club and Hillarys Yacht Club. Both of these clubs have regular boating regattas and activities within Park waters.	1	No	Provision for these clubs is already in place and will continue.	2(d)
5	The Whitfords Bay Sailing Club will be leasing an area for permanent club rooms on the foreshore at Mullaloo Point.	1	No	This is acknowledged.	2(d)
	11.5 Surface Water Sports *5 submissions.*				
1	Recommendation 2 should provide separate delegated areas for motorised and non-motorised craft.	1	No	Areas can be designated for specific types of craft/activities if necessary and already occurs for some craft.	2(d)
2	CALM should compile criteria for the assessment of applications for organised sporting events.	1	No	This level of detail will be addressed during the implementation of the plan.	2(c)
3	Jet skis and high-powered boats for water-skiing should not be permitted in the Park.	1	No	Appropriate areas can be designated. Some activities can not be catered for in the Park.	2(d)
4	Supprt Recommendation 1.	1	No	Support for plan.	2(a)
5	Concerned at effect of organised sporting events on normal fishing days.	1	Yes, p.43	Consideration will be given to impacts on other users when permits are assessed. A new section, 19.8 Competitive Events, has been added.	1(c)
6	Will there be any monitoring of surface water sports, and who will be monitoring ?	1	No	CALM monitors surface water sports.	2(b)
7	Is it feasible for a six-monthly report to be prepared and forwarded to relevant bodies for consideration ?	1	No	Annual reports are prepared. Refer to 32.0 Review.	2(d)
8	It would appear that any non-motorised water activities or sports activities require an approval application. Does this include the weekend sailor ?	1	Yes, p.43	Permits are only required for competitive events. A new section (19.8) has been added, and 19.5 Surface Water Sports was rewritten to clarify this. Areas can be designated for specific types of craft or activities if needed, e.g. water skiing.	1(e)
9	Care is required when separating swimmers from other sports, and motorised sports from non-motorised sports.	1	No	This is acknowledged, there is provision to designate areas for particular uses.	2(d)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
	12.0 COMMERCIAL ACTIVITIES **12.1 Fishing** *2 submissions.*				
1	Support the recommendations.	1	No	Support for plan.	2(a)
2	The proposals are not justified. Any proposal of this nature should be assessed on individual merits given the greater emphasis on marine protection. A blanket ban on any technological advance in fishing techniques seems a most peculiar position to adopt.	1	Yes, p.44	Amend Action 2.	1(d)
	12.1.1 Rock Lobster Fishery *1 submission.*				
1	Commercial rock lobster fishing should not be permitted within 1800 m of high water mark and be subject to monitoring of impact on individual reefs and conflict.	1	No	Recreation has priority within 1800m from coastline and the impact of commercial rock lobster fishing is monitored.	2(d)
	12.1.2 Abalone Fishery *2 submissions.*				
1	Support management of abalone populations in conjunction with Fisheries Department.	1	No	Support for plan.	2(a)
2	There are two populations being managed: sub-tidal and intertidal platforms such as Trigg.	1	No	This is acknowledged.	2(d)
3	Need to close a few heavily fished intertidal platforms such as Trigg, to protect heavily stressed abalone populations.	1	No	This is already occurring.	2(d)
4	Should have a permanent ban on recreational abalone fishing with the occasional cull by licensed commercial abalone fishermen as deemed necessary by the Fisheries Department.	1	No	Recreational abalone fishing is managed by the Fisheries Department. Restrictions, including bans, can be imposed and are assessed annually. Liaison is essential.	2(d,f)
	12.1.3 Beach Seining *3 submissions.*				
1	Amend last sentence, second paragraph to read: Beach seining needing beach access by 4WD vehicles requires access approval from local authorities.	1	Yes, p.45	Amend accordingly.	1(e)
2	Suggest new recommendation: Four wheel drive access for beach seining will require approval from the City of Wanneroo.	1	Yes, p.45	See Comment 1, this section.	1(e)
3	There is no justification given for phasing out this activity; it is controlled under Section 17 of the Fisheries Act. What conservation advantage would be served by phasing out this activity ?	1	No	Beach seine fishing conflicts with both conservation and recreation values.	2(e)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
4	Potential conflict with other users could be minimised by instigating closures based on times of intensive use by other groups.	1	No	This is already being undertaken.	2(d)
5	If marine parks are genuinely areas of multiple use then the continuation of commercial beach seine fishing should not be ruled out as it has been in Recommendation 1.	1	No	See Comment 3, this section.	2(e)
	12.2 Fishing Charter				
	1 submission.				
1	Oppose Recommendation 3: it is important to be flexible and allow for ad hoc charter permits for operators 'passing through' and not restrict access to single operators who may well be elsewhere in the State when a charter group wish to travel.	1	Yes, p.46	Amend Action 3.	1(d)
	12.3 Concessions				
	No submissions.				
	12.4 Aircraft				
	1 submission.				
1	Strict regulations already exist governing the conduct of low-flying aircraft.	1	No	Low-flying aircraft constitute a genuine problem and liaison is required.	2(d)
2	Complaints re. dangerous or irresponsible low-flying aircraft should be directed to the Civil Aviation Authority or RAAF as appropriate.	1	No	Support for plan.	2(a)
	12.5 Marine Pollution				
	1 submission.				
1	Support Recommendation 1.	1	No	Support for plan.	2(a)
2	Recommend CALM involvement within harbours.	1	No	CALM liaises with Dept of Marine and Harbours on matters concerning harbours.	2(d)
	12.6 Marketing and Promotion				
	1 submission.				
1	Tourism Commission would be pleased to assist CALM in the development of a marketing and promotions strategy, in the incorporation of Park information in its brochures etc., and in the use of the Commission's distribution network.	1	No	No change sought.	2(b)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
	13.0 LAND MANAGEMENT **13.1 Marine Park** *2 submissions.*				
1	Support the recommendation.	2	No	Support for plan.	2(a)
	13.2 Little Island *2 submissions.*				
1	Support the recommendations.	2	No	Support for plan.	2(a)
	14.0 EDUCATION *4 submissions.*				
1	Support the recommendations.	3	No	Support for plan.	2(a)
2	Senior members of angling clubs could be appointed as honorary rangers to assist with educating public.	1	No	This is not feasible but other forms of community involvement in plan implementation are.	2(f)
3	Children who catch wrong type or size of fish could be given on the spot community service work, e.g. clean the beach of plastics.	1	No	Beyond the scope of the plan.	2(c)
	15.0 RESEARCH *3 submissions.*				
1	Support the recommendations.	2	No	Support for plan.	2(a)
2	Alter Recommendation 3 to include monitoring of impacts of use, rather than merely use.	1	Yes, p.59	Amend Action accordingly.	1(d)
	16.0 ADMINISTRATION OF MANAGEMENT **16.1 Interagency Agreement** *2 submissions.*				
1	Will the Memorandum of Understanding be available to the public ?	1	No	This will be for departmental use only.	2(f)
2	Memorandum of Understanding should be thoroughly discussed with the relevant bodies prior to implementation of the final plan.	1	No	This is acknowledged.	2(d)
	16.2 Consultative Committee *1 submission.*				
1	A representative from the Friends of Marmion Marine Park should be included on the Consultative Committee.	1	No	The Consultative Committee is comprised of local and State Govt. agencies. Membership will be revised as necessary. Issues can be brought to the Committee through CALM.	2(c,f)

COMMENT NUMBER	SUMMARY OF COMMENT	NO. OF SUBS	PLAN AMENDED	DISCUSSION / ACTION TAKEN	CRITERIA
	16.3 Search and Rescue *No submissions.*				
	16.4 Surveillance and Enforcement *1 submission.*				
1	Officers of the City of Wanneroo's Security Department should be informed of any surveillance and enforcement measures prior to implementation of the final plan.	1	No	This is ongoing.	2(d)
2	More information as to the implementation of the recommendations is required.	1	No	Regular liaison with local authorities will occur during implementation.	2(d)
	17.0 POTENTIAL IMPACTS OF PARK MANAGEMENT *2 submissions.*				
1	Support text.	2	No	Support for plan.	2(a)
	18.0 REVIEW PROCESS *2 submissions.*				
1	Support text.	2	No	Support for plan.	2(a)
2	Regular contact with City of Wanneroo personnel may aid the Marine Park management in detecting trends and monitoring Park use.	1	No	Regular liaison with local authorities will occur during implementation.	2(d)
	APPENDICES **Appendix 1** *1 submission.*				
1	Some of these fauna may also be taken from recreation zones according to earlier text. This should be clarified and should stand as expressed in Appendix 1.	1	Yes, p.14	Zoning scheme has been altered.	1(b)
	Appendix 2 *1 submission.*				
1	Wading with a gidgee for cobbler is recognised as a legitimate form of fishing and should be exempt from the 1800 m restriction.	1	No	This activity is not exempt.	2(d)

APPENDIX 1. SUBMITTORS TO THE DRAFT MANAGEMENT PLAN

CALM J K Smart
J A Stoddart
G Friend

Community Organisations
Australian Anglers Association (W.A. Division)
Friends of Marmion Marine Park
Hillarys Yacht Club, Fishing Section
Living Water Skindiving Club

Government (Local)
City of Stirling
City of Wanneroo

Government (State)
Bush Fires Board of W.A.
Department of Land Administration
Department of Planning and Urban Development
Environmental Protection Authority
Fisheries Department
Western Australian Fishing Industry Council (Inc.)
Western Australian Museum
Western Australian Tourism Commission

Individuals
G Watson
Mr & Mrs J M du Plesis
Dr F E Wells
G J Russell-Brown
C Connor & P Thomas

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